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June 18, 2020

To the Honorable President Yee and Members of the San Francisco Board of Supervisors

RE: APPEAL OF PLANNING COMMISSION CERTIFICATION OF FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR BALBOA RESERVOIR PROJECT. (Case No. 2018-007883ENV)

I am an attorney representing Madeline Mueller, Alvin Ja, and Wynd Kaufmyn (hereinafter, "Appellants"). On behalf of the Appellants, and pursuant to San Francisco Administrative Code Section 31.16, I hereby appeal the Planning Commission's certification of the Final Subsequent Environmental Impact Report ("FSEIR") for the Balboa Reservoir Project ("Project") and its adoption of findings supporting that certification on May 28, 2020. All of the Appellants participated in the administrative process for the preparation and approval of the FSEIR, and all submitted both oral and written comments on the Draft SEIR during the public review period. Due to the unusual present circumstances, this appeal is being submitted both electronically via email and in "hard copy" via the U.S. Mail. A check for the $640 appeal fee is being submitted with the hard copy of the appeal.

The reasons for the appeal are substantive and procedural violations of the California Environmental Quality Act in the preparation and certification of the Final EIR, inadequate findings adopted by the Planning Commission in support of that certification, and an inadequate statement of overriding considerations. Details of the bases for this appeal are laid out below and in the attached exhibits, which exhibits are incorporated into this appeal by this reference. I expect to submit further explanation and amplification on these points in subsequent submittals to the Board prior to the hearing on this appeal.

A. Substantive Violations of the California Environmental Quality Act ("CEQA")

CEQA contains numerous provisions about what is required to be contained in an EIR. The FSEIR for this project violated a number of these provisions, making its certification improper and a violation of CEQA.

1. The Description of the Project area and existing conditions is incomplete and inaccurate. While the EIR makes passing mention of the surrounding major uses in the Project, notably the Ocean Campus of City College of San Francisco ("CCSF"), Archbishop Riordan High School, and Lick Wilmerding High School, it does not provide adequate information on the extent and nature of those uses, both present and

reasonably foreseeable, and the way they would be affected by the proposed Project. Further, while the EIR does mention that CCSF is planning to expand its Ocean Campus, and that the expansion includes the addition of new buildings, including a Performing Arts Education Building (Diego Rivera Theater) and a STEAM (science, technology, engineering, arts, and mathematics) Building, it does not mention that these buildings, which have now been funded by a bond measure passed by San Francisco voters in March 2020, would occupy a good portion of the parking lot just to the east of the Project site, which the EIR relies upon to accommodate most of the student parking needs for CCSF. The tentative construction schedule for those buildings would overlap with construction of the Project, resulting in unanalyzed potentially significant cumulative construction impacts (see attached Exhibit A – CCSF Phasing Plan). Nor does it consider that the expansion of the CCSF Ocean Campus will increase the student enrollment at that campus, and can therefore be expected to further increase the need for space to accommodate parking for its entirely commuter San Francisco student population.

2. The project description is inaccurate and inconsistent. "An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199.) The Project is described as including 1,100 residential housing units, half of which (550) would be market rate and half of which would be divided between units permanently affordable to low or moderate-income tenants. However, the description of the project actually states that "up to 50 percent" of the units would be designated as affordable units. (See, Notice of Preparation at p. 14.; DSEIR at p. 6-59.) Nowhere in the EIR does it disclose exactly what percentage of the project *will* be affordable units. In fact, the DEIR makes clear that it has not yet been determined, but would depend on future "market surveys, funding source restrictions and other stakeholder input on the affordable housing plan." (DSEIR at p. 2-13.) Not only does this not comply with the requirements that the project description be stable, accurate, and finite, but it also implicates the Project's impact analysis. It is well known that lower income households are more likely to use public transit for a higher percentage of their household trips than are upper income households of the type who would occupy market rate, or even moderate-income, units. Consequently, leaving the final percentage of affordable units, as well as their level of affordability, unspecified makes the analysis of vehicle miles traveled for the Project indeterminate and hence inaccurate. That, in turn, also affects the Project's other impacts, including air quality, pedestrian and bicyclist safety, and transit delay impacts.

3. Failure to identify and mitigate significant impacts, including: 1) cumulative construction impacts (noise, air quality, transit delay, pedestrian and bicyclist safety) from construction of the Project and adjoining CCSF construction projects. 2) transportation (VMT) and air quality impacts due to cumulative parking shortage and resulting "cruising" by students and other searching for available on-street parking spaces.[1] 3) land use impacts, including not disclosing that the proposed project is

[1] This impact was grossly underestimated, as the number of marking spaces available for CCSF students and faculty were grossly overestimated by not considering the increased parking demand

fundamentally inconsistent with priority policies adopted by the voters of San Francisco in Proposition M, specifically: Policy #2 – That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods, and Policy #7 – That our parks and open space and their access to sunlight and vistas be protected from development. Both of these policies were adopted to protect the environment. 4) Noise impacts on the adjoining CCSF Multi-Use Building, which houses childcare classes, as well as on other childcare facilities and schools in the vicinity of the Project site. The children in these childcare facilities and schools are sensitive receptors who will be especially harmed by construction and operational noise impacts. This impact was neither identified, nor was mitigation of the impact considered. In addition, the FSEIR erroneously identified the time of least noise sensitivity as between 9 AM and 4 PM. Yet this is the time when classes are being held at CCSF, and childcare facilities are in operation, including time for naps for very young children. These are NOT times on minimum sensitivity.

4. Failure to include a reasonable range of feasible alternatives, including specifically alternatives that would reduce significant impacts so as to allow all decision makers and the public to make reasoned choices. The FEIR, with no supporting evidence, asserts that an alternative that would construct a 100% affordable housing project is infeasible. As justification, the City asserts that a 100% affordable project would not meet the project objective of building "a mixed-income community with a high percentage of affordable units to provide housing options at a range of income levels." However, a 100% affordable project could include both moderate and low-income units. If that was not a sufficient range, some very low-income units could be added. It should be noted that the area surrounding the project already includes significant amounts of moderate upper income households; so removing market rate units would still result in a mixed-income community.

   The City also claims that SFPUC ratepayers need to be provided fair market value for the land PUC owns.[2] However, if the land remains in the hands of the City and County, there has been no change in ownership, so the ratepayers would not have been "short-changed." Finally, the City claims that a 100% affordable project would be a different project. Of course, that is correct, but noting in CEQA requires that a project alternative be no more than a variant on the proposed project. A 100% affordable city-owned project is still an alternative that should have been given serious consideration. Not only would it have been a smaller project (with at roughly the same amount of affordable housing), and therefore have reduced transit delay, air quality, and construction noise impacts, but because it is well documented that lower income households use transit more, the transit delay impacts due to auto use in the Project would be further reduced. Further, if some of the low and moderate income units were dedicated to faculty at CCSF and other nearby schools and residents who

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from implementation of the CCSF Master Plan. (Compare Tables 13 and 14 in the attached traffic analysis (Exhibit B). The SEIR used Table 13 when Table 14 was the proper table.)

[2] It is highly questionable whether the price at which the property is being offer to the Project developers, $11 million, represents the fair market value for this 17 acre parcel.

work nearby, those residents would walk to work, totally eliminating their impacts on transit. In short, a 100% affordable project was a feasible alternative with lower impacts that was unjustifiably excluded from consideration.

5. Ignoring the cumulative impacts of the Project, taken together with impacts associated with implementation of the City College of San Francisco Master Plan, and specifically the long-planned Diego Rivera Theater and STEAM Building, located directly adjacent to the Project site, and which will significantly exacerbate air quality, transit delay, and bicyclist safety impacts that have already been identified as significant and unavoidable.

B. Procedural violations of CEQA – failure to recirculate DSEIR based on changed circumstances and new information that will require substantial modifications to the EIR. (CEQA Guidelines § 15088.5; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal. 4th 1112.)

The circulation of the DSEIR was completed on September 23, 2019. However, the Responses to Comments was not issued until April 29, 2020. During the intervening period, the COVID-19 pandemic began, resulting in a shelter-in-place order that has extended from March 2020 to the present. During that time, public transit availability and usage has dramatically decreased – by over 90%. Concomitantly, there has been a dramatic increase in the use of telecommuting by employees, both in San Francisco, the Bay Area, and throughout California. Further, the hiring of new employees in San Francisco had been reduced practically to zero, and the vacancy rate for rental housing has dramatically increase due to residents leaving the City because they no longer need to or want to continue living here. While one can expect to see some hiring/rehiring once the shelter in place order is lifted, and there will likely be some return to use of public transit, it is likely that many of the changes induced by the pandemic will result in permanent changes to San Francisco's lifestyle, including less public transit use an far more telecommuting. All of these are facts of general knowledge that the Board of Supervisors, and the San Francisco Planning Department and well aware of.

Nevertheless, the Planning Department released a Response to Comments Document that totally ignored the circumstances of the COVID 19 pandemic and its implications for what makes sense for the use of this site. In essence, the San Francisco Planning Department has attempted to ignore the dramatically altered circumstances surrounding this project. Those circumstances make the analysis presented in the FSEIR essentially irrelevant. A new analysis taking into account these changes circumstances is needed before an informed decision can be made about whether this Project still makes sense.

C. Inadequate Findings to support certification of the FSEIR.

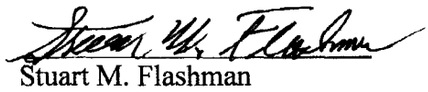
The findings made is support of the certification of the FSEIR, including the CEQA findings, are inadequate in that they do not adequately support the certification of the EIR and they are not supported by substantial evidence in the record. In addition, the Statement of Overriding Considerations approved in support of the EIR's certification

and the Project's approval is invalid because it understates the Project's significant and unavoidable impacts, thus making any attempt to balance those impacts against the Project's putative benefits invalid. Further, many of the claimed benefits are not supported by substantial evidence in the record and the claim that any one of the claimed benefits would suffice to outweigh the Project's impacts is conclusory and unsupported by any explanation or justification, especially when several of the significant and unavoidable Project impacts would adversely affect human health and safety for inhabitants of the area surrounding the Project, including bicyclists, students, and young children.

Finally, I would like to request, as a matter of procedural fairness, the following when this matter is brought to hearing before the Board of Supervisors: 1) That the time allotted to City staff and the project proponent in opposing the appeal be equal to the amount of time allotted to the appellants to present their appeals; 2) that the appellants be allowed a reasonable amount of time for rebuttal of the arguments presented by staff and the project proponent; and 3) that the appeal be scheduled early enough in the day that members of the public who wish to speak on the appeal have a reasonable time available to make their comments without having the hearing run on until the early morning hours, when those with daytime jobs will have had to leave in order to get up for work the next morning.

We hope that the Board of Supervisors will give this appeal the serious attention and consideration that the many questions surrounding this large and impactful project deserve.

Respectfully Submitted:



Stuart M. Flashman
Attorney for Appellants

Attachments:

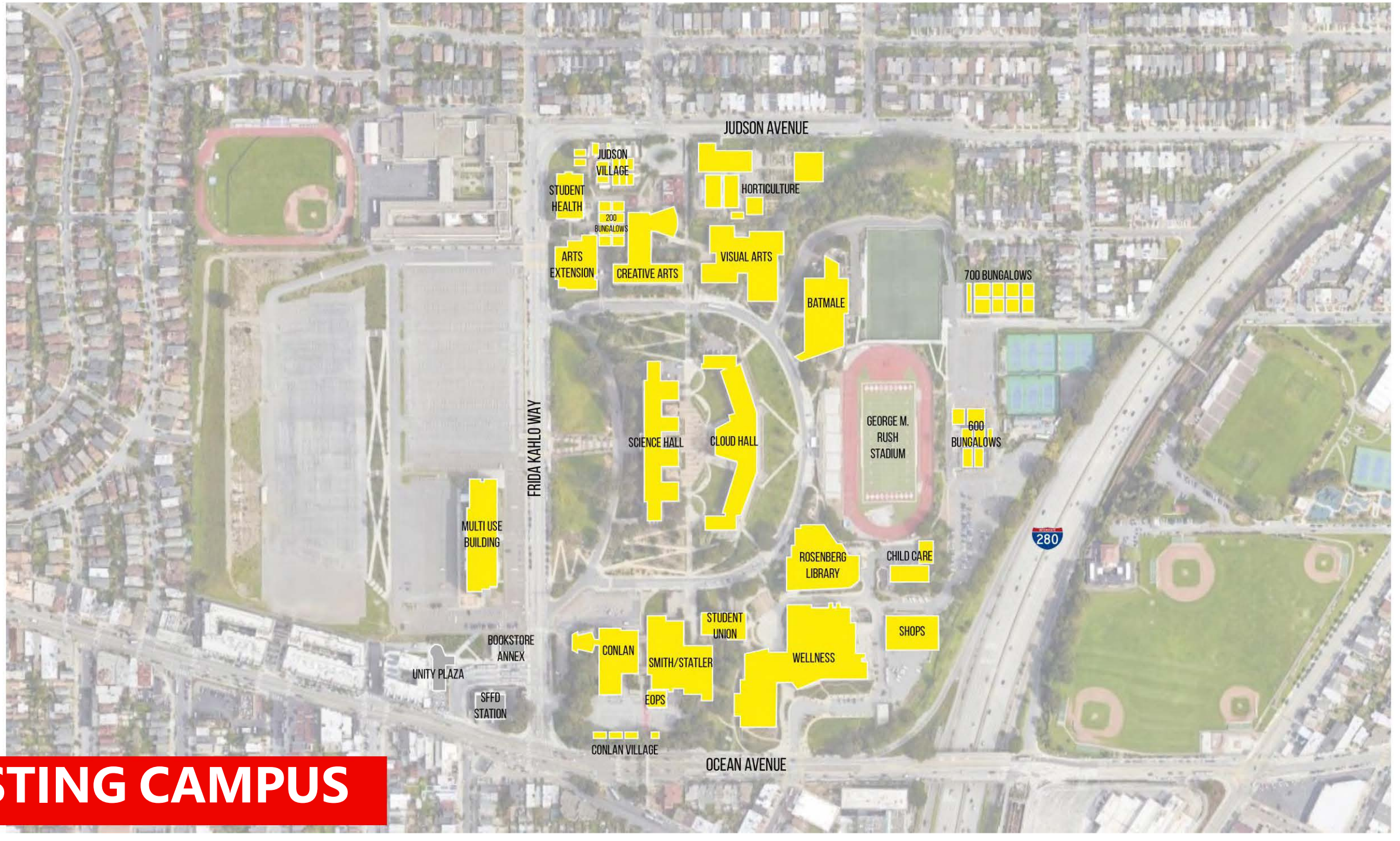
Exhibits A & B
Planning Commission Resolutions M-20730, M-20731
Check for appeal fee

CC:

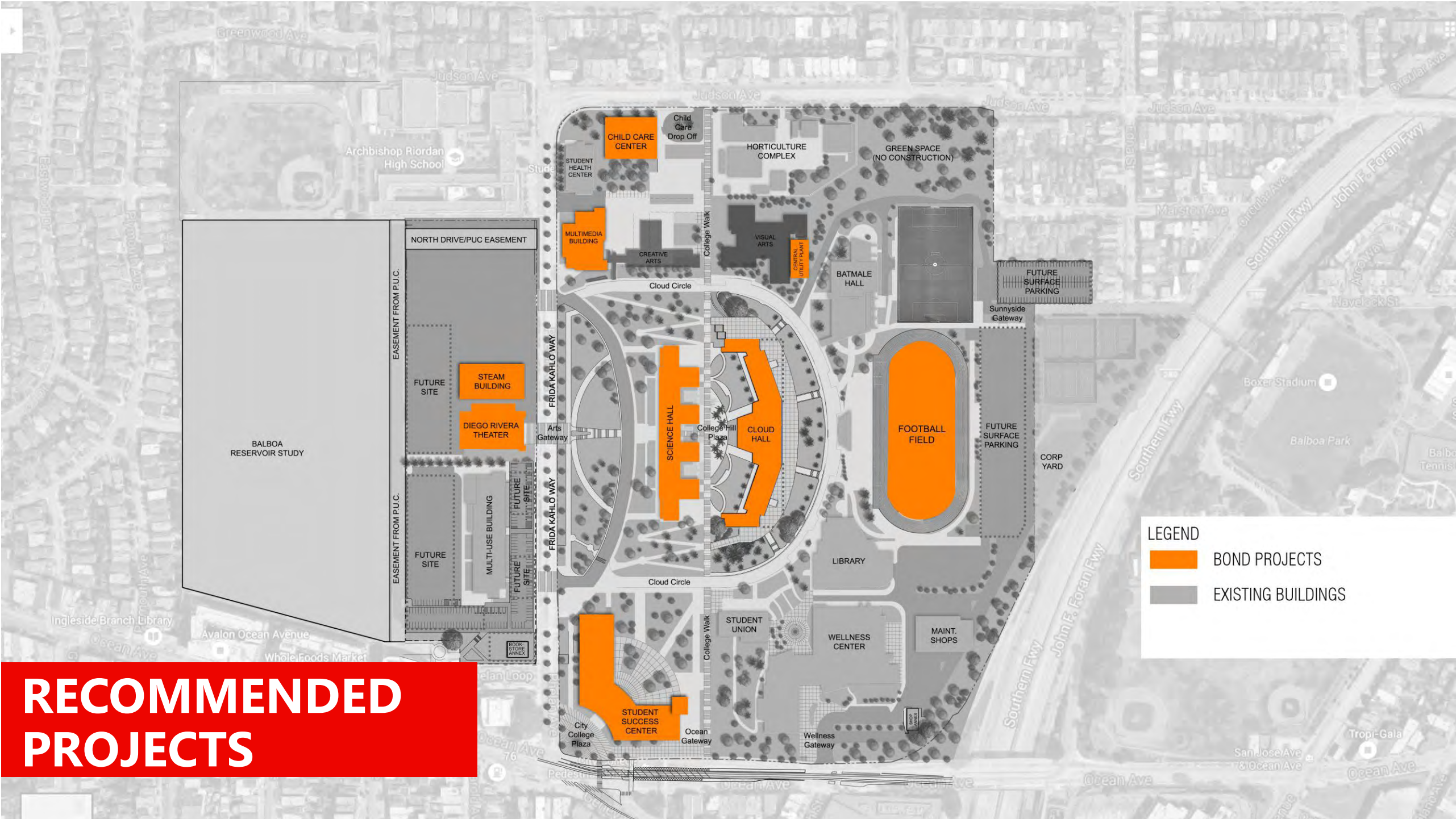
San Francisco Environmental Review Officer
Ms. J. Poling, S.F. Planning Dept.
San Francisco Public Utilities Commission

Exhibit A

HIGH LEVEL PROGRAM REVIEW

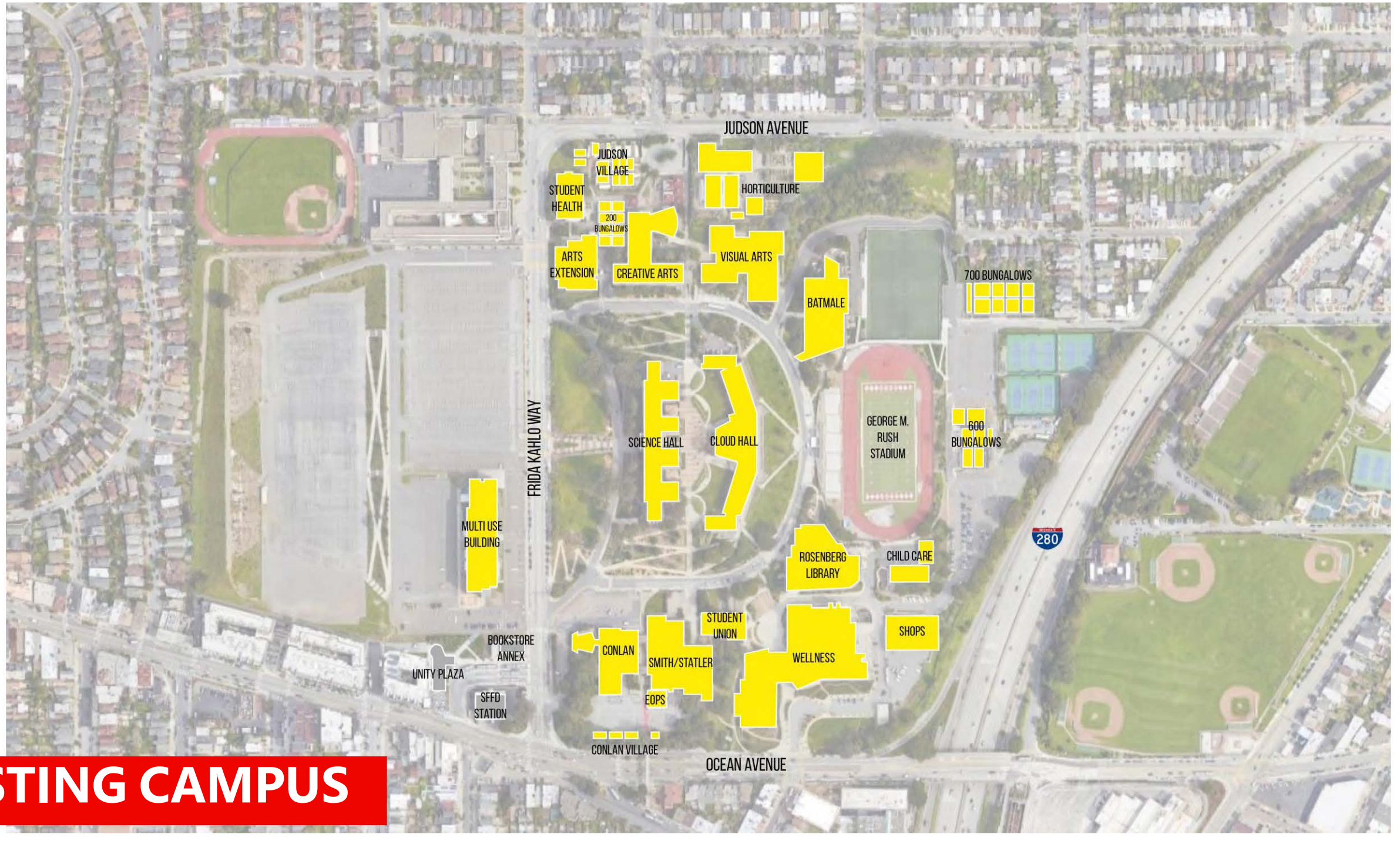


EXISTING CAMPUS

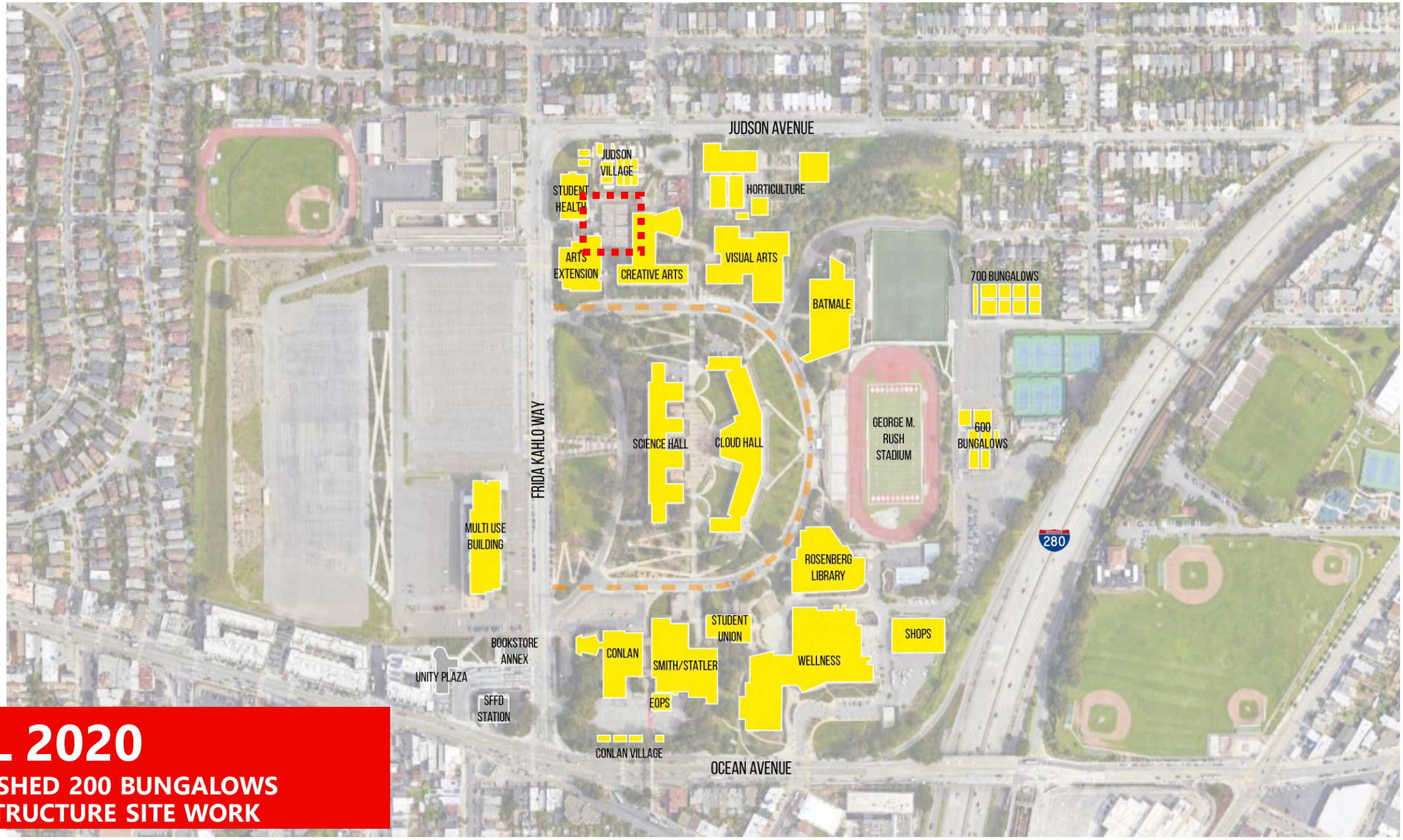


RECOMMENDED PROJECTS

FIVE YEAR PHASING PLAN

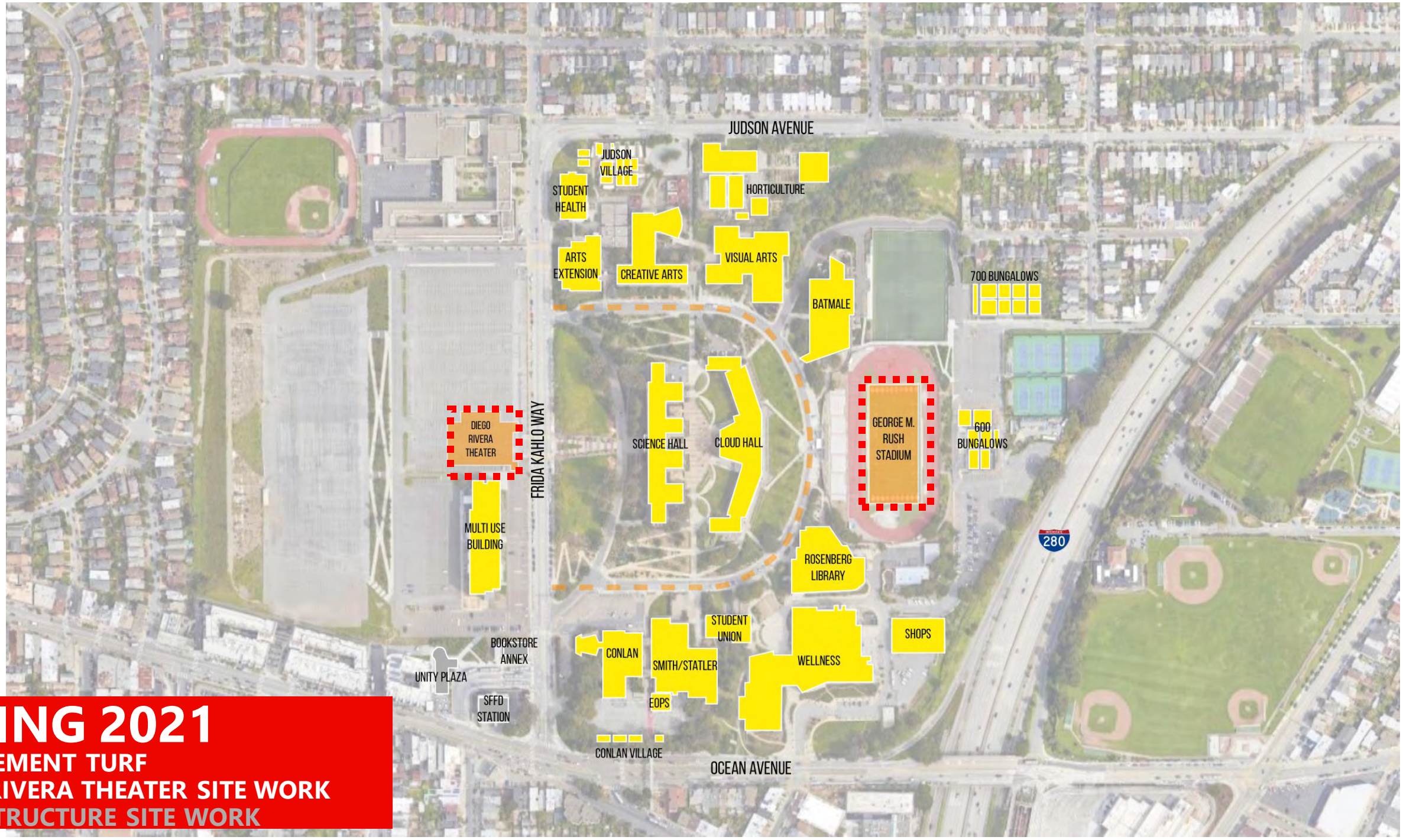


EXISTING CAMPUS



FALL 2020

DEMOLISHED 200 BUNGALOWS
INFRASTRUCTURE SITE WORK

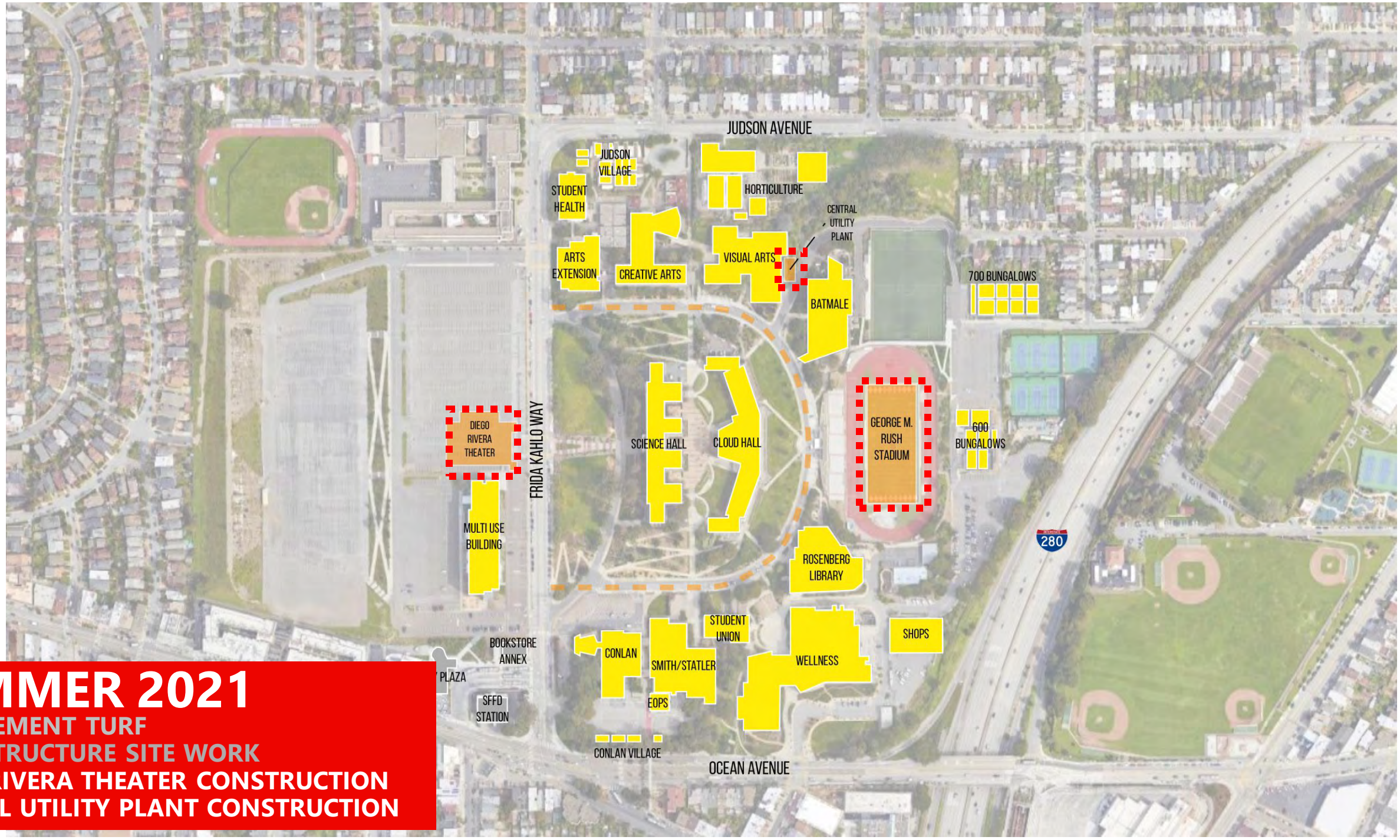


SPRING 2021

REPLACEMENT TURF

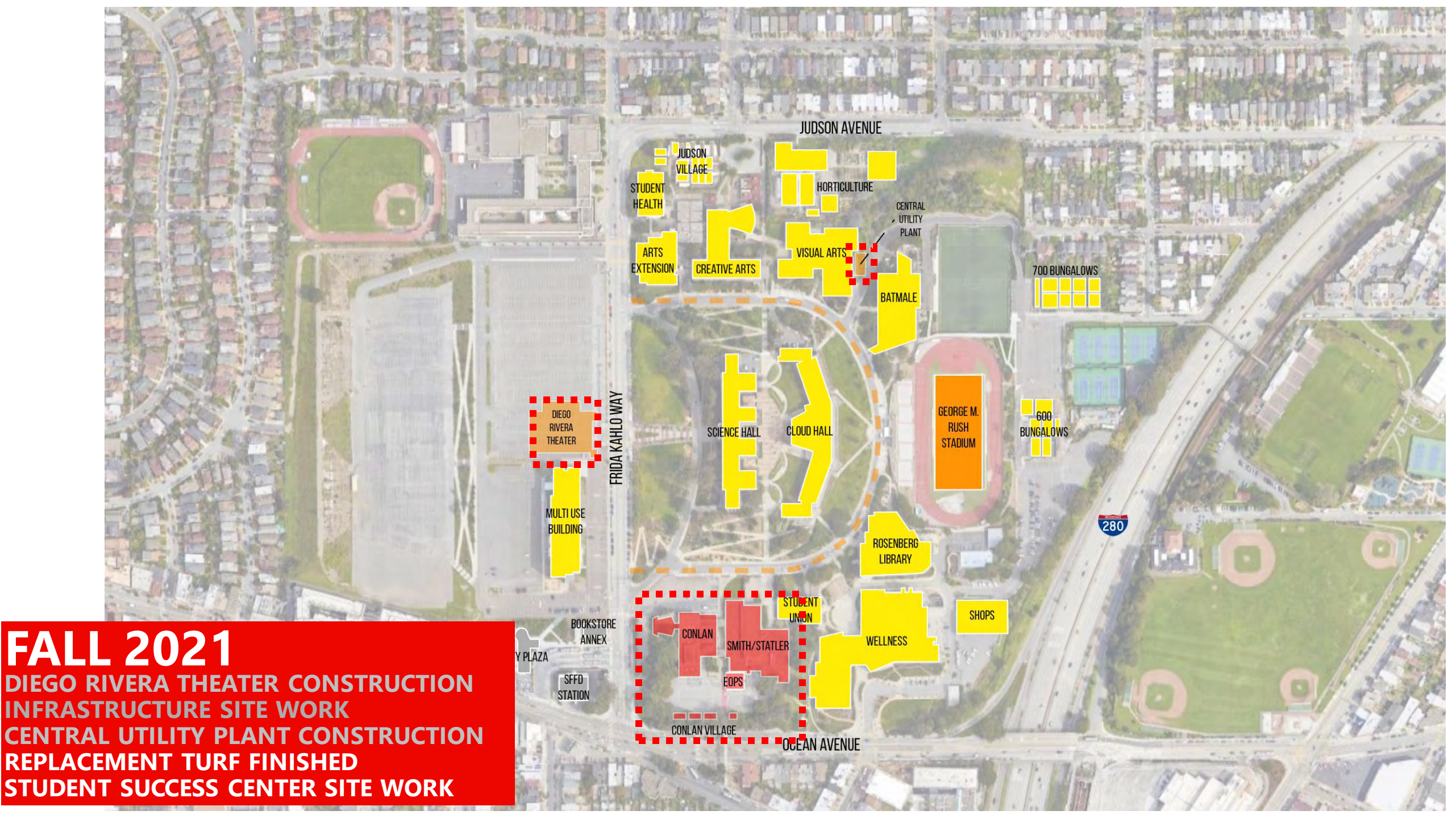
DIEGO RIVERA THEATER SITE WORK

INFRASTRUCTURE SITE WORK



SUMMER 2021

REPLACEMENT TURF
INFRASTRUCTURE SITE WORK
DIEGO RIVERA THEATER CONSTRUCTION
CENTRAL UTILITY PLANT CONSTRUCTION

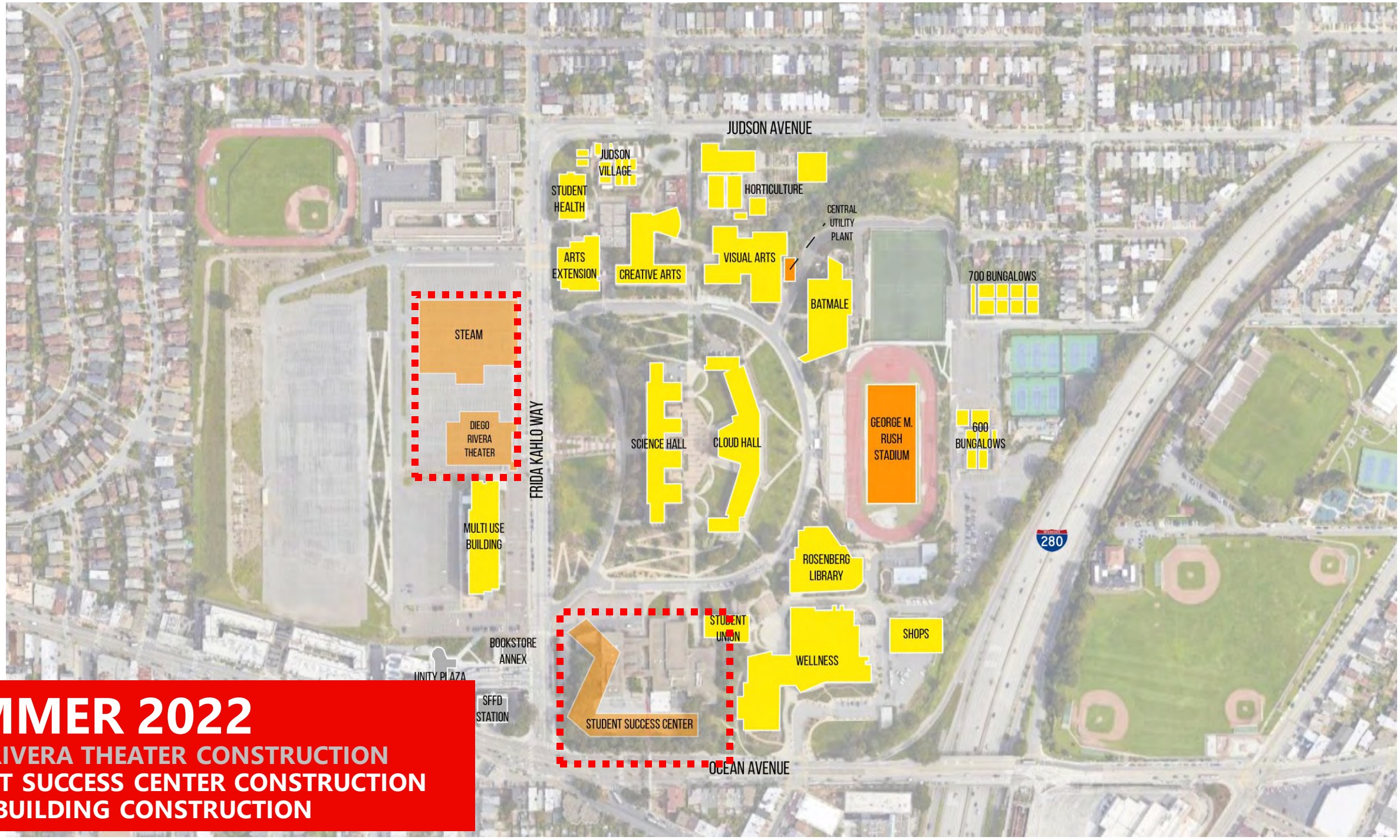


FALL 2021

DIEGO RIVERA THEATER CONSTRUCTION
INFRASTRUCTURE SITE WORK
CENTRAL UTILITY PLANT CONSTRUCTION
REPLACEMENT TURF FINISHED
STUDENT SUCCESS CENTER SITE WORK

SPRING 2022

DIEGO RIVERA THEATER CONSTRUCTION
STUDENT SUCCESS CENTER SITE WORK
CENTRAL UTILITY PLANT FINISHED
STEAM BUILDING SITE WORK

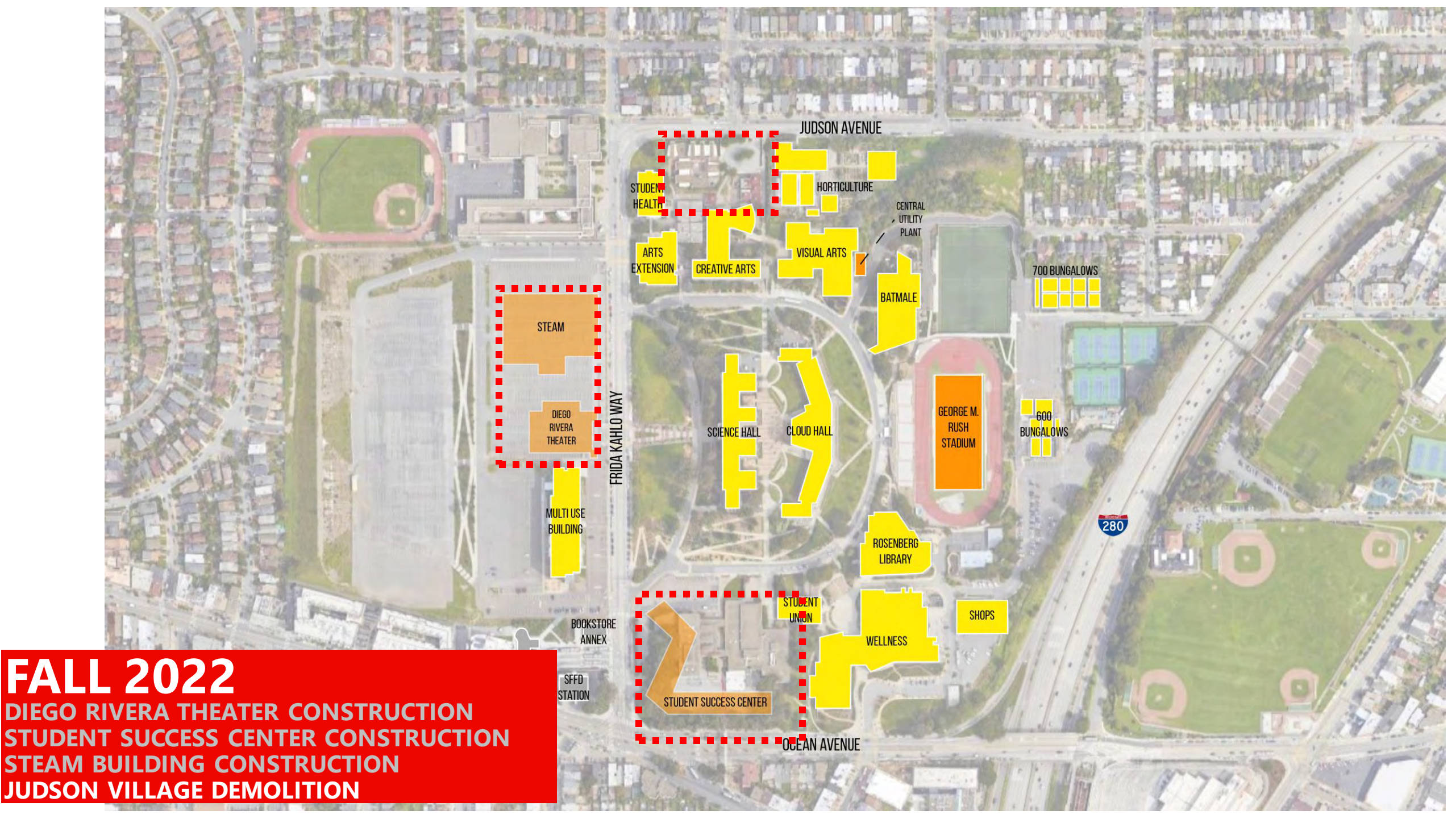


SUMMER 2022

DIEGO RIVERA THEATER CONSTRUCTION

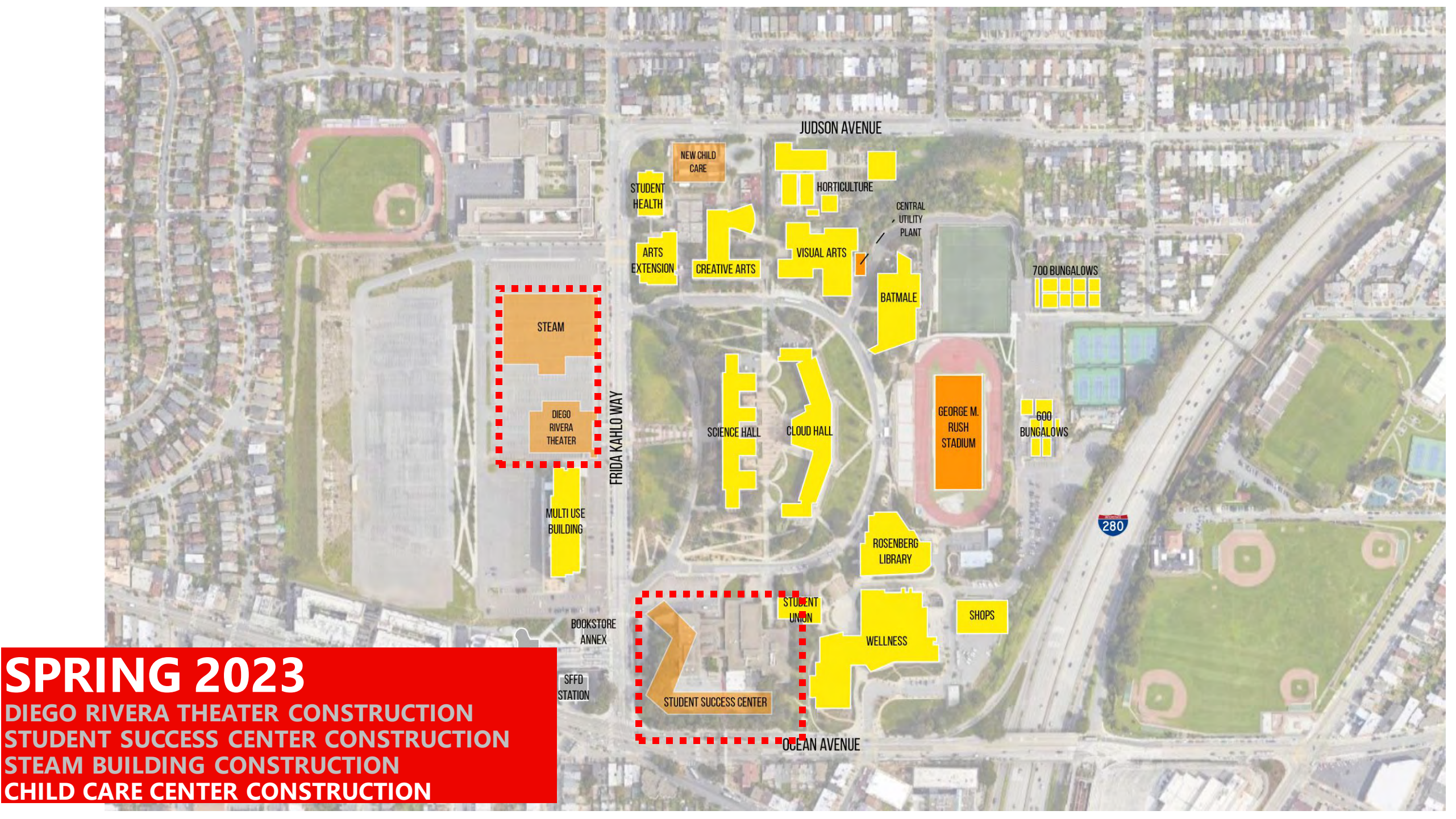
STUDENT SUCCESS CENTER CONSTRUCTION

STEAM BUILDING CONSTRUCTION



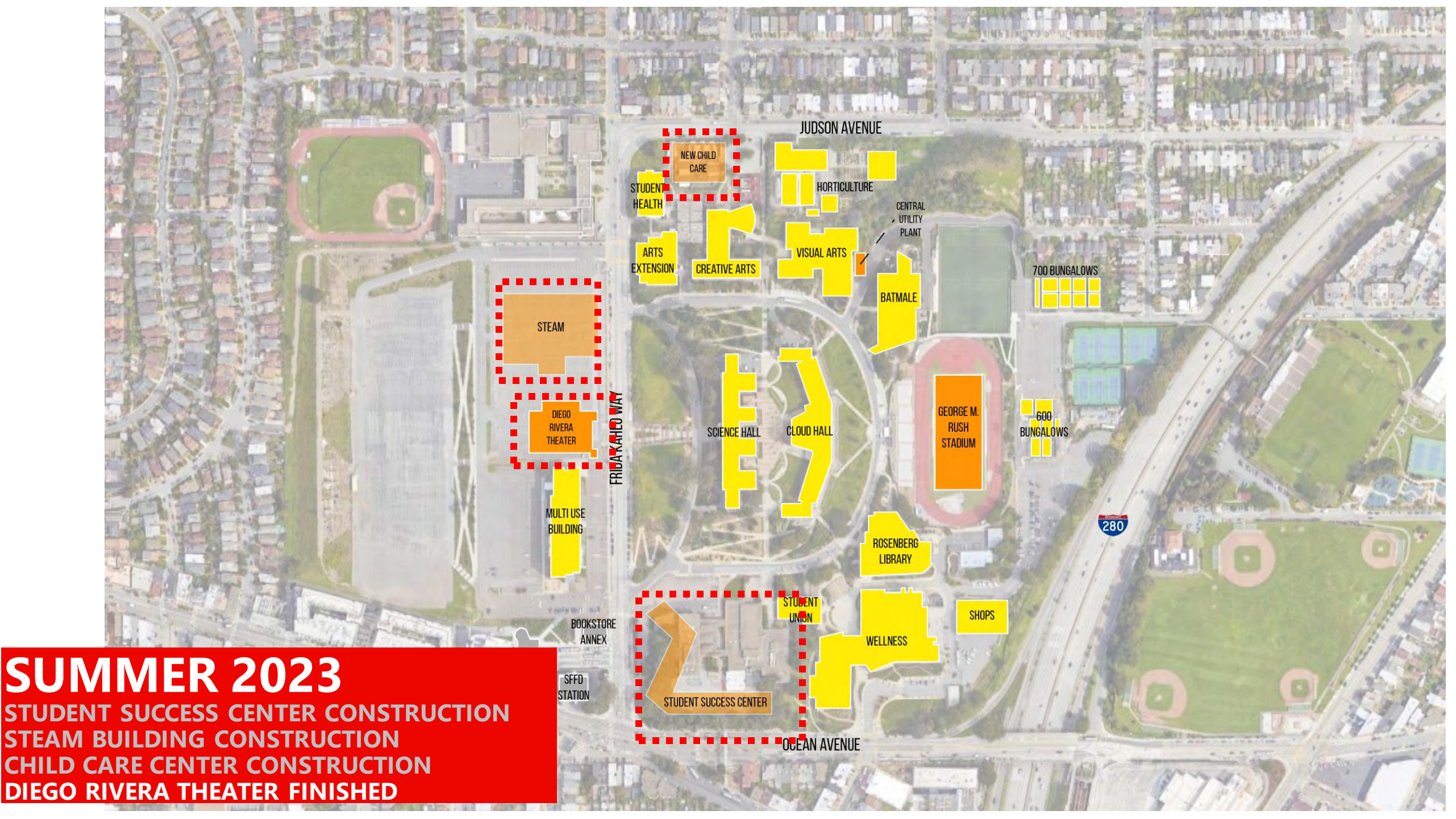
FALL 2022

DIEGO RIVERA THEATER CONSTRUCTION
STUDENT SUCCESS CENTER CONSTRUCTION
STEAM BUILDING CONSTRUCTION
JUDSON VILLAGE DEMOLITION



SPRING 2023

DIEGO RIVERA THEATER CONSTRUCTION
STUDENT SUCCESS CENTER CONSTRUCTION
STEAM BUILDING CONSTRUCTION
CHILD CARE CENTER CONSTRUCTION



SUMMER 2023

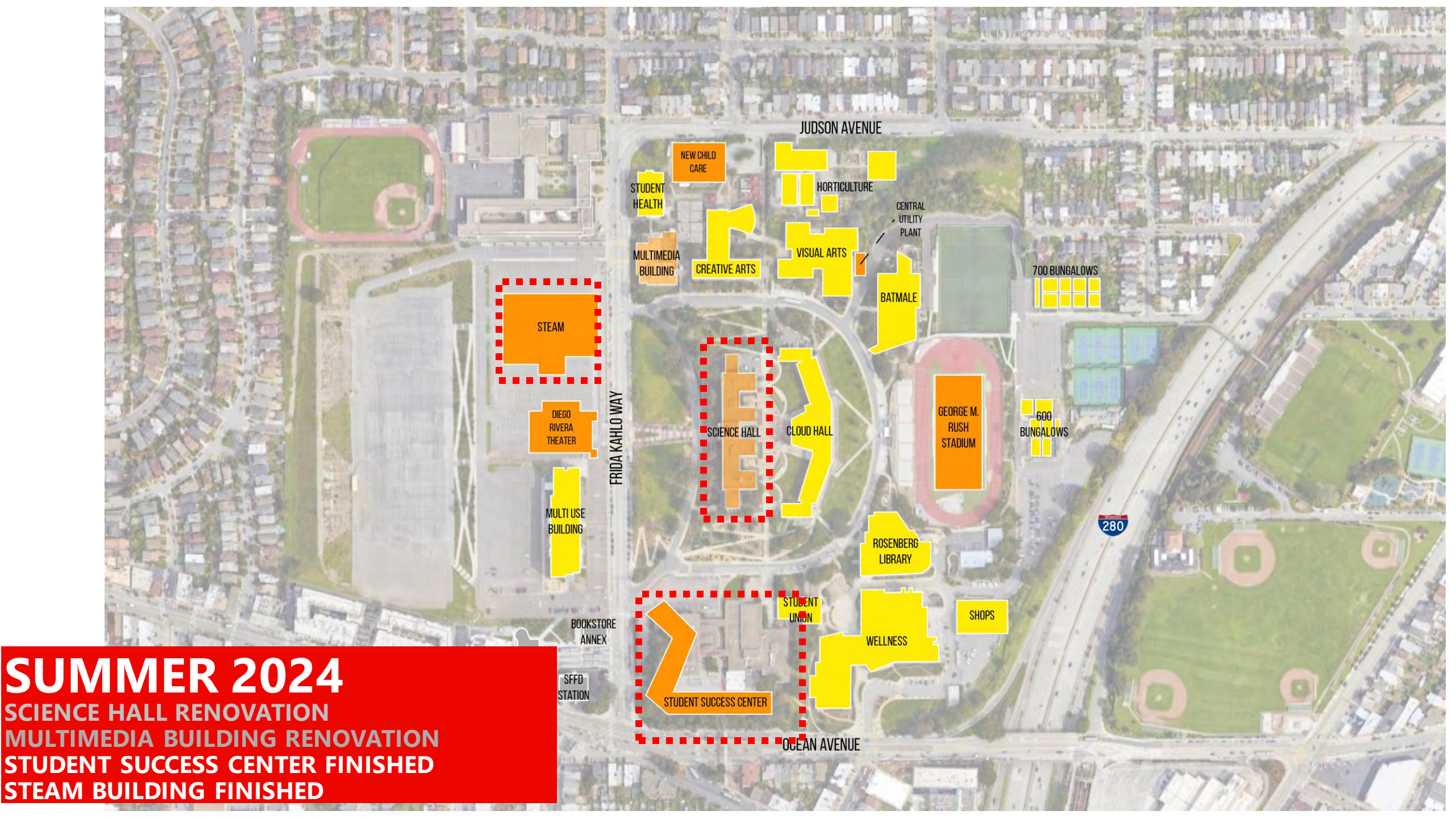
STUDENT SUCCESS CENTER CONSTRUCTION
STEAM BUILDING CONSTRUCTION
CHILD CARE CENTER CONSTRUCTION
DIEGO RIVERA THEATER FINISHED

FALL 2023

STUDENT SUCCESS CENTER CONSTRUCTION
STEAM BUILDING CONSTRUCTION
CHILD CARE CENTER CONSTRUCTION

SPRING 2024

STUDENT SUCCESS CENTER CONSTRUCTION
STEAM BUILDING CONSTRUCTION
CHILD CARE CENTER FINISHED
SCIENCE HALL RENOVATION
MULTIMEDIA BUILDING RENOVATION



SUMMER 2024

SCIENCE HALL RENOVATION

MULTIMEDIA BUILDING RENOVATION

STUDENT SUCCESS CENTER FINISHED

STEAM BUILDING FINISHED

FALL 2024

SCIENCE HALL RENOVATION
MULTIMEDIA BUILDING RENOVATION
CLOUD HALL RENOVATION

SPRING 2025

CLOUD HALL RENOVATION
SCIENCE HALL RENOVATION
MULTIMEDIA BUILDING FINISHED

SUMMER 2025

CLOUD HALL RENOVATION
SCIENCE HALL RENOVATION

FALL 2025

CLOUD HALL RENOVATION
SCIENCE HALL RENOVATION

SPRING 2026

CLOUD HALL RENOVATION FINISHED
SCIENCE HALL RENOVATION FINISHED
CREATIVE ARTS AND VISUAL ARTS DEMO
600 AND 700 BUNGALOW DEMO

Exhibit B

Prepared by
FEHR & PEERS

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San Francisco, CA 94104
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March 15, 2019

City College of San Francisco

Transportation Demand Management (TDM) and Parking Plan

Table of Contents

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Executive Summary

This plan outlines a strategy for City College of San Francisco (CCSF) to implement a suite of transportation demand management (TDM) measures and parking management strategies at its Ocean Campus, located in the Outer Mission neighborhood of San Francisco. As CCSF prepares its upcoming Ocean Campus Facilities Master Plan (FMP), begins construction on a new Performing Arts and Education Center (PAEC), and as housing development proceeds in the Balboa Reservoir, there will be changes in student enrollment, the number of employees on campus, and campus parking supply. These changes will necessitate proactive management of parking and transportation facilities, as growth in enrollment will likely lead to an increase in demand for travel to campus, while development in the Lower Reservoir and Upper Reservoir parking facilities will likely decrease available parking supply, absent construction of additional parking facilities.

CCSF Facilities staff have set the following goals for this TDM plan:

Maintain just and equitable access to a CCSF Education: While demand for driving to campus could potentially be addressed through market-rate parking, CCSF is concerned with the effects that such a program would have on lower income students, or those students who rely on a car due to their home location or need to get to a job. As such, strategies are included that help address these concerns while still working to reduce vehicle trips to campus.

Manage demand for parking: Due to anticipated development by neighbors and pursuant to the FMP, parking will likely become less readily available at CCSF's Ocean Campus. As such, managing parking demand will help maintain strong relationships with surrounding neighborhoods and help insure students can access educational facilities. Additionally, there are some secondary effects, which may include fewer individuals searching for on-campus parking as it becomes less readily available.

Make progress towards sustainability goals: Under the CCSF Sustainability Plan, managing drive alone trips is a key aspect to reducing the Campus's carbon footprint. As such, this plan proposes to reduce student and employee driving trips by approximately 20 percent and 10 percent, respectively. Further reductions in driving trips may be possible under an expanded TDM program, which could help CCSF meet more ambitious or updated climate change prevention goals. This document may also serve to help update the transportation portions of the CCSF Sustainability Plan, which was published in 2009.

Create a TDM plan that is financially viable to implement: Finally, the cost of the program is one key constraint; as such, measures have been prioritized based on cost and ease of implementation, while other measures are identified but not recommended for short-term implementation.

Existing Transportation Conditions

Based on 2018 travel survey results, the majority of both employees and students live within the City of San Francisco, with many living within three miles of CCSF. The majority of CCSF employees commute by driving alone, while the majority of students do not drive to campus (**Figure E-1**); relatedly, students must pay for parking on campus, while employees are provided free parking as a benefit to employment. The primary barrier named by employees and students in traveling to campus is one of time: they choose to drive because it is the fastest available commute option. Other concerns include the cost of transportation, particularly for students, and safety when connecting to BART or walking to existing parking facilities (**Figures E-2** and **E-3**). Therefore, efforts to help reduce the number of people driving to CCSF would ideally help address concerns regarding the relative travel time for different modes, safety and connectivity, and the relative cost of different modes.

Figure E-1: Mode of Travel by Population, 2018 Survey

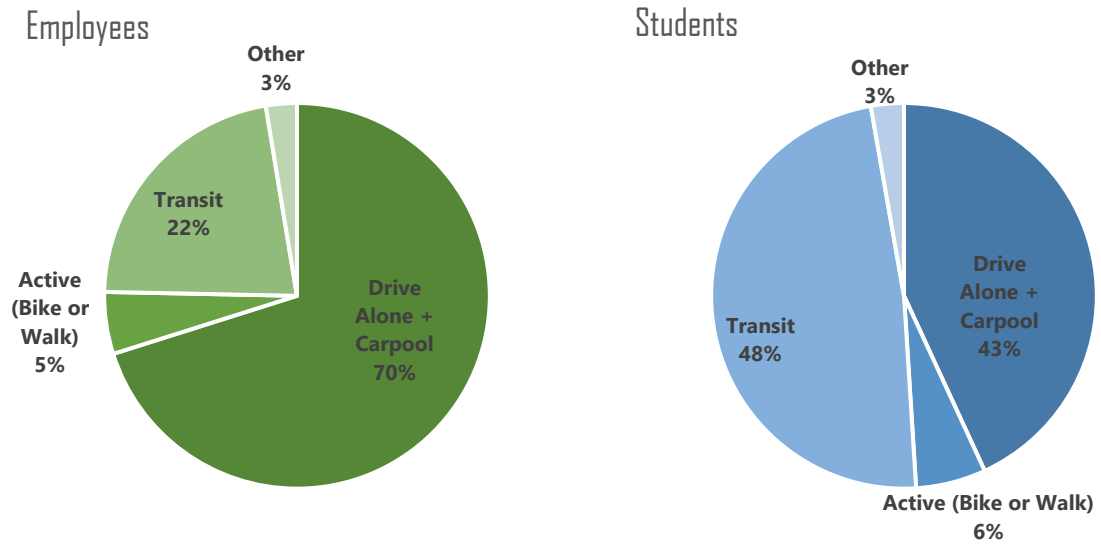
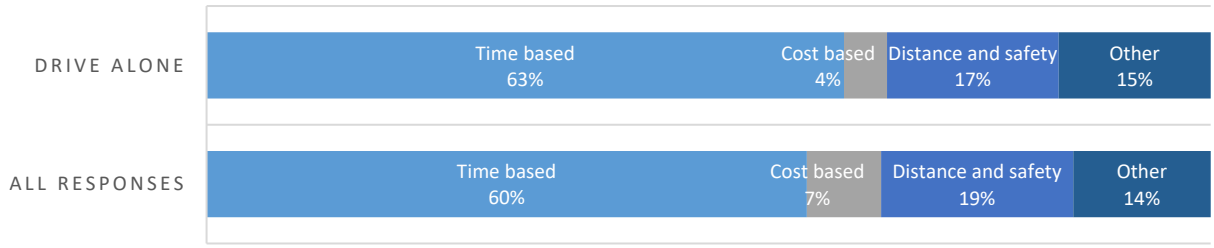
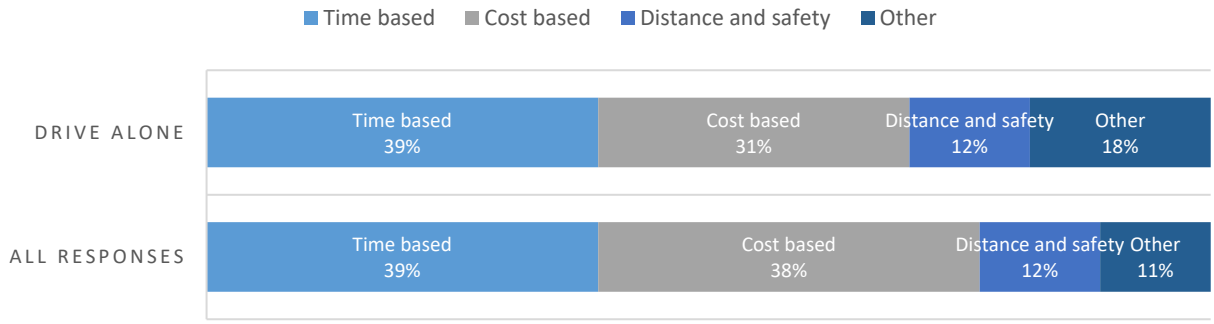


Figure E-2: Employee Transportation Barriers and Concerns



"Distance" includes both long walking distances to and from parking facilities or transit facilities, distance from home to CCSF, or general comfort and safety when walking or driving longer distances.
Source: Fehr & Peers, 2019

Figure E-3: Student Transportation Barriers and Concerns



"Distance" includes both long walking distances to and from parking facilities or transit facilities, distance from home to CCSF, or general comfort and safety when walking or driving longer distances.
Source: Fehr & Peers, 2019

However, TDM strategies cannot typically reduce travel times for transit, walking, or bicycling relative to driving. Transit subsidies and adjusting parking pricing can both address the relative costs of individual mode choices, but can be expensive, unpopular or infeasible (as a result of State laws governing student parking rates). Furthermore, many employees commented to indicate that they placed a high value on their free parking benefit.

TDM Strategies

The resulting TDM strategies recommended for CCSF reflect both the ease and cost of implementation, as well as addressing certain key barriers related to travel choices, as discussed above. The list of strategies, which begins on page 24, is separated into five strategy types:

1. **Maintain Equitable Access to a CCSF Education:** Equity and access are key values to CCSF and its mission. This objective suggests secondary strategies to support students with limited financial resources.
2. **Create a variety of affordable options to encourage use of transit**: CCSF is in a transit-rich city; however, additional support can help students and employees address key barriers such as long walks, extended wait times, or high costs of transit passes.
3. **Support Walking and Bicycling, especially for those living within three miles of campus:** Many students and employees live within bicycling distance of campus, but commute via car. These strategies help promote walking and bicycling.
4. **Advertise and Incentivize Sustainable Transportation:** The barriers to changing transportation behavior are high, so direct support and encouragement are key elements to the TDM Plan
5. **Manage Existing Parking Supply:** Through carefully adjusting pricing, revising the permit system, and more stringent enforcement, CCSF can manage demand for parking spaces. Additional measures to help shift driving behavior by faculty and staff may be necessary, including pricing employee parking.

The overall TDM Plan is divided into two groups of measures: Core TDM Measures, which represent low and moderate cost options to help address parking and travel demand, and Additional TDM Measures, which represent higher cost options. The anticipated reduction to driving trips from the Core Measures is around 5 to 10 percent for employees and 15 to 20 percent for students; with additional measures, the estimated reduction increases to a 15 to 20 percent reduction for employees and a 25 to 30 percent reduction for students.

Parking Analysis

Parking demand associated with CCSF is anticipated to increase as college enrollment grows; current projections estimate a 25 percent increase in enrollment and FTEs by 2026. **Table E-1** shows the baseline parking demand at both current enrollment levels, at future enrollment levels, and at future enrollment levels with the TDM Plan in place.

Table E-1: Baseline Parking Demand and Supply

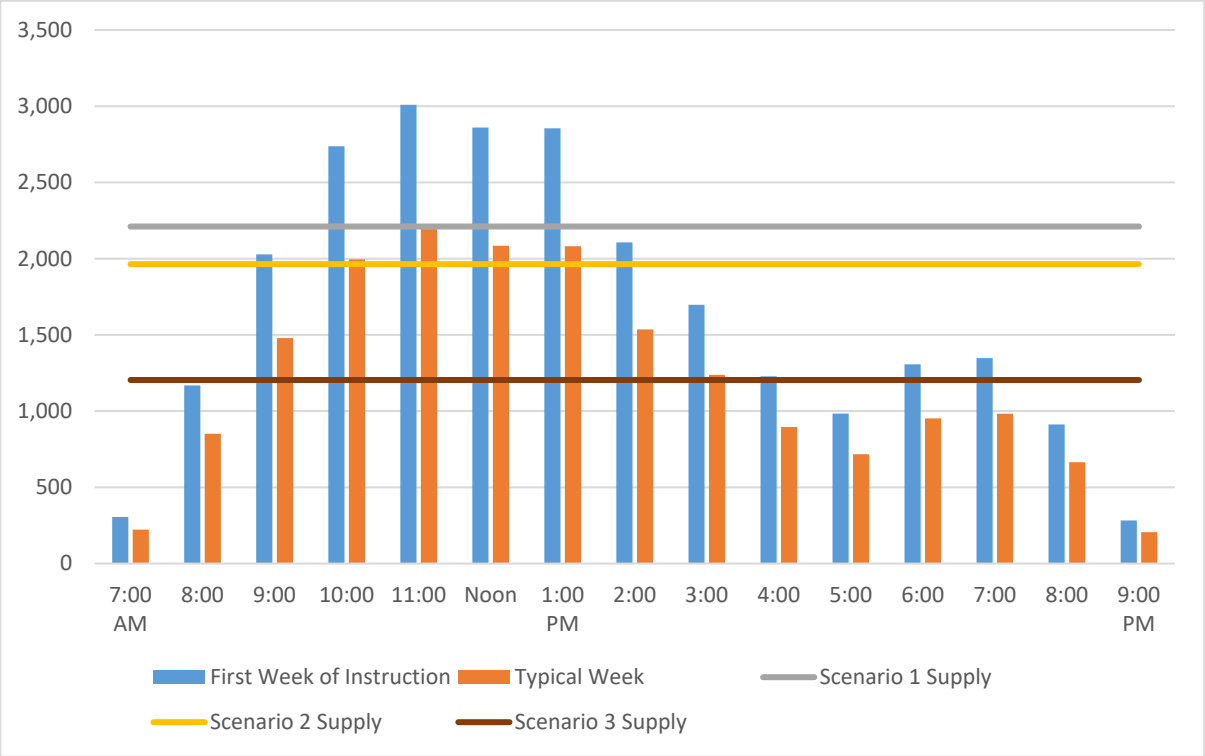
Enrollment/ TDM Scenario	Peak Day Parking Demand (First Week of Instruction)	Non-Peak Demand (Typical Day in Semester)	Supply	Unserved Demand - Baseline Peak Day of First Week of Instruction	Unserved Demand - Baseline Typical Day in Semester
2018	2,835	2,066	3,010	0	0
2026 (25% growth) without TDM	3,543	2,583	3,010	572	0
2026, with core TDM	3,010	2,194	3,010	39	0
2026, with additional TDM	2,294	1,672	3,010	0	0

In addition to changes in demand, the total supply of parking on campus is expected to change due to two projects: the construction of housing on the Lower Reservoir parking lot and the addition of a Performance and Education Center (PAEC) on the Upper Reservoir parking lot. Fehr & Peers provided supply and demand analysis for the following scenarios:

- Scenario 0: Baseline Conditions (i.e., no changes to campus or Lower Reservoir; shown in Table E-1)
- Scenario 1: Baseline Conditions + PAEC
- Scenario 2: Baseline Conditions + Balboa Reservoir Housing
- Scenario 3: Baseline Conditions + PAEC + Balboa Reservoir Housing

Results of the parking analysis by time of day are presented in **Figure E-4**, for both the peak time in the semester (during the first week of school) and during a more typical week. During the peak demand hour from 11:00 AM to 12:00 PM, the potential unserved parking demand with a TDM program in place ranges from zero spaces under Scenario 1 during a typical week, to more than 1,800 spaces under Scenario 3 during the first week of school.

Figure E-4: Projected Demand and Supply by Time of Day (25% Enrollment Increase + Core TDM Strategies)



However, these projections do not take into account changes to parking demand as a result of reductions in supply, such as individuals choosing to change travel mode when parking becomes more difficult. Based on survey responses, we estimate that sixty percent of students and employees would change their travel patterns if parking were more difficult to find. When accounting for this shift, the shortfall of spaces under the most intensive scenario (with both the PAEC and the Balboa Reservoir Housing) is reduced to around 400 spaces with implementation of a TDM plan.

Next Steps

Based on this analysis, CCSF administrative staff will need to address several key questions to determine how to address potential changes in parking demand and supply on campus over time. These questions include:

What level of investment does CCSF want to make in providing affordable transportation alternatives? The Core TDM Strategies represent cost-effective means of reducing demand for parking and for driving alone to campus. However, the more effective strategies include higher costs, particularly if CCSF wishes to consider subsidizing transit.

How will CCSF balance parking demand with sustainability goals and minimizing the impact of vehicle trips? As noted above, the parking demand numbers presented here represent the latent demand for parking, or the number of people wishing to drive to campus and park during the peak hours *all else being equal*. The Core TDM Strategies represent cost-effective means of reducing demand for parking and for driving alone to campus. However, the more effective strategies include higher costs, particularly if CCSF wishes to consider subsidizing transit. Fehr & Peers recommends adopting and implementing the drive alone trip reduction targets provided in the Core TDM Measure list and assessing changes in travel and parking patterns over time as parking availability fluctuates during construction of the PAEC and Balboa Reservoir Housing Project.

Is meeting parking demand a financial investment priority for the College? Constructing parking structures is a costly venture, and so this question goes hand-in-hand with the question of whether CCSF can accept some level of unmet parking demand. Feedback from employees indicates that they place a high value on the parking benefits provided to them; conversely, students were more likely to request investment in alternative transportation or in educational facilities rather than in parking.

In considering these questions, Fehr & Peers recommends that CCSF adopt a phased approach to building new parking facilities, with the first phase reflecting unmet parking demand after implementation of Core TDM measures. CCSF should also incorporate a feedback loop for assessing parking demand over time including reviewing the effectiveness of TDM measures and any changes in travel and parking patterns. Based on feedback from those affected, as well as the trade-offs of constructing a parking structure, an informed decision can be made on whether and when to proceed with building additional parking.

Chapter 1. Introduction

As City College of San Francisco (CCSF) prepares its upcoming Ocean Campus Facilities Master Plan (FMP), begins construction on a new Performing Arts and Education Center (PAEC), and as housing development proceeds in the Balboa Reservoir, there will be significant changes in student enrollment, the number of employees on campus, and campus parking supply. Growth in enrollment will likely lead to an increase in demand for travel to campus, while development in the Lower Reservoir and Upper Reservoir parking facilities will likely decrease available parking supply, absent construction of additional parking facilities.

This document outlines current transportation and parking conditions at the CCSF Ocean Campus, located in the Balboa Park neighborhood of San Francisco, and analyzes how conditions may change in the future, and what steps CCSF can take to manage its parking and transportation facilities. It then presents a plan for both transportation demand management (TDM), as well as analysis of potential parking demand under a variety of future conditions. This plan is intended to lay out a strategy to proactively manage parking and transportation facilities, in both the near term and the long term.

CCSF Facilities staff have set the following goals for this TDM plan:

Reduce Demand for Parking: Due to anticipated development by neighbors and under the FMP, parking will likely become less readily available at CCSF's Ocean Campus. As such, managing demand for this parking will help maintain strong relationships with surrounding neighborhoods, maintain current benefits provided to employees, and help insure students can access their educational facilities.

Reduce Drive Alone Trips to Campus: Under the CCSF Sustainability Plan, managing drive alone trips is a key aspect to reducing the Campus's carbon footprint. As such, this plan proposes to reduce student and employee driving trips by approximately 20 percent and 10 percent, respectively.

Maintain just and equitable access to a CCSF Education: While demand for driving to campus could potentially be addressed through market-rate parking, CCSF is concerned with the effects that such a program would have on lower income students, or those students who rely on a car due to their home location. As such, strategies are included that help address these concerns while still working to reduce vehicle trips to campus.

Create a Financially Sustainable Program: Finally, the cost of the program is one key constraint; as such, measures have been prioritized based on cost and ease of implementation, while other measures are identified but not recommended for short-term implementation.

This report begins by summarizing existing transportation conditions at CCSF Ocean Campus, discusses potential TDM measures that help meet CCSF's goals, and estimates the potential effectiveness of that plan in reducing driving trips, as well as demand for parking on campus. A more detailed analysis of parking supply and demand is included in Chapter 4. Finally, recommendations regarding next steps for CCSF are presented, based on the analysis contained in this Plan.

Chapter 2. Existing Setting and Transportation Conditions

CCSF is a public, two-year community college located the City of San Francisco. It operates across multiple campuses within San Francisco, and enrolled a total of 63,000 students in the 2017-2018 academic year. Many students attend classes on a part-time or non-credit basis; the number of "full-time equivalent" (FTE) students was around 22,000 in 2017-2018, with around 12,000 FTEs attending courses at Ocean Campus. CCSF employs a total of 2,200 employees, consisting primarily of part-time faculty and classified staff.

2.1 Transportation Offerings

Regional vehicular access is provided via Interstate 280 through the Ocean Avenue interchange. Local vehicular access is primarily provided via the Ocean Avenue and Frida Kahlo Way intersection. Ocean Campus currently provides around 3,000 parking spaces, available to employees free of charge, and to students at a cost of $5.00 per day, via purchase of a daily vending machine permit. Employees display a permit allowing them to park for free, and in restricted employee-only areas. Students can purchase a semester-long sticker indicating their status, or pay for parking each day they park, at a rate of $5 per day.

Nearby transportation facilities include the Balboa Park BART Station (0.5 miles from the center of campus), the J-Church Muni Light Rail line on San Jose Avenue (0.5 miles from the center of campus), the M-Ocean View Muni Light Rail line on San Jose Avenue and Geneva Street, the K-Ingleside Muni Light Rail line on Ocean Avenue (0.25 miles from the center of campus), and Muni bus lines 8, 8BX, 29, 43, 49 and 91, which all operate on Ocean Avenue and stop on or near Frida Kahlo Way. **Figure 1** illustrates the campus location and nearby transportation facilities.

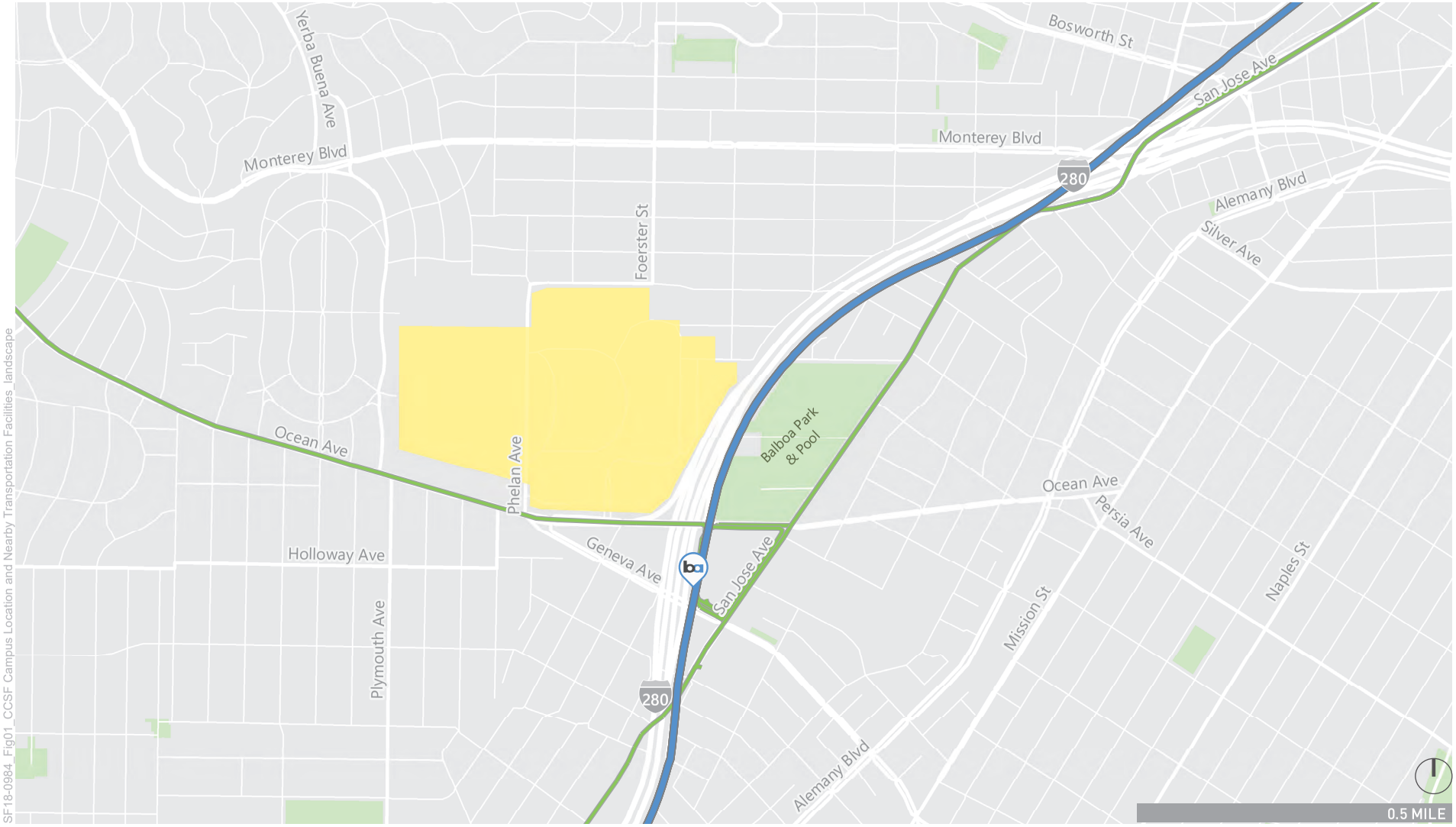


Figure 1

CCSF Campus Location and Nearby Transportation Facilities

2.2 Existing Transportation Policies

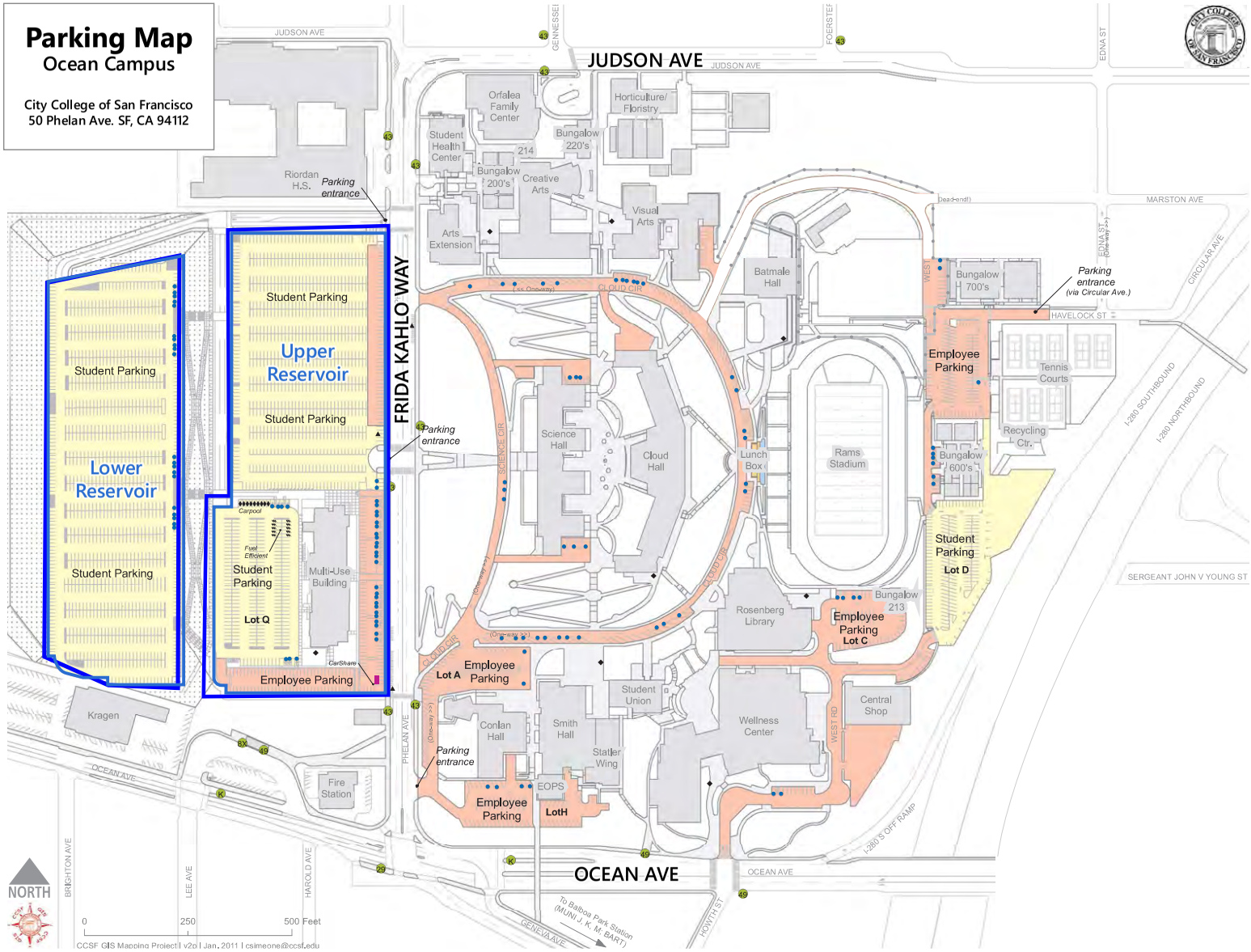
CCSF currently administers several policies that affect how students and employees use the transportation facilities available at or near the campus; due to the current high supply of parking spaces, parking demand does not typically overflow into the neighborhood under current conditions, and employees and students both indicate that parking is easy to find. Even so, a substantial share of employees and students travel to the campus via public transportation.

The primary transportation policies set by CCSF administration that influence mode choice to and from the campus are:

- **Free parking available to all employees**: All faculty and categorized employees are provided free parking by CCSF; this benefit is included in the current labor contract.
- **Pre-tax commuter benefit withholding**: Employees are provided the option to withhold a portion of their pay on a pre-tax basis for use on public transit. The extent to which this program is taken advantage of should be assessed.
- **Campus Police Escort Program**: On request, campus police accompany employees and students to their parked vehicle or to public transit stops on campus. The extent to which this program is taken advantage of should be assessed.
- **CCSF Sustainability Plan**: CCSF's Sustainability Plan has set a goal of reducing drive-alone trips by 15 to 20 percent, campus-wide. It includes suggestions for TDM measures that are included in this Plan, and reports on progress towards meeting the Plan's vehicle trip reduction goals.

2.3 Existing Parking Conditions

Currently, parking is provided primarily through two surface lots immediately west of Frida Kahlo Way, and through a collection of surface lots and on-street parking spaces east of Friday Kahlo Way. **Figure 2** illustrates the parking facilities and designations. The surface lots west of Frida Kahlo Way are collectively referred to as the "Upper Reservoir" lot and "Lower Reservoir" lot. Additional parking, primarily for employees or other specific uses (such as bookstore parking, loading, or maintenance vehicle parking), is provided east of Frida Kahlo Way. Total parking supply across the campus is around 3,000 spaces and summarized in **Table 1**; spaces are roughly equally distributed between the lower reservoir, upper reservoir, and East of Frida Kahlo Way areas; however, as shown on **Figure 2,** parking lots closer to the campus center (i.e., Cloud Hall) are primarily reserved for employees.



Employee Parking
Student Parking
Disabled Parking
Motorcycle Parking
Bicycle Parking
Fuel Efficient Parking
Carpool
Car Share
49 Bus Stop
Construction Area

Figure 2

CCSF Ocean Campus Parking Locations

Table 1: Parking Supply, CCSF Ocean Campus

Location	Employee Permit Parking	General Parking	Motorcycle Parking	ADA Parking	Other Parking	Total
East of Frida Kahlo Way	472	332	55	90	47	**996**
Lower Reservoir	0	987	0	20	0	**1,007**
Upper Reservoir	83	890	0	7	27	**1,007**
Total	**555**	**2,209**	**55**	**117**	**74**	**3,010**

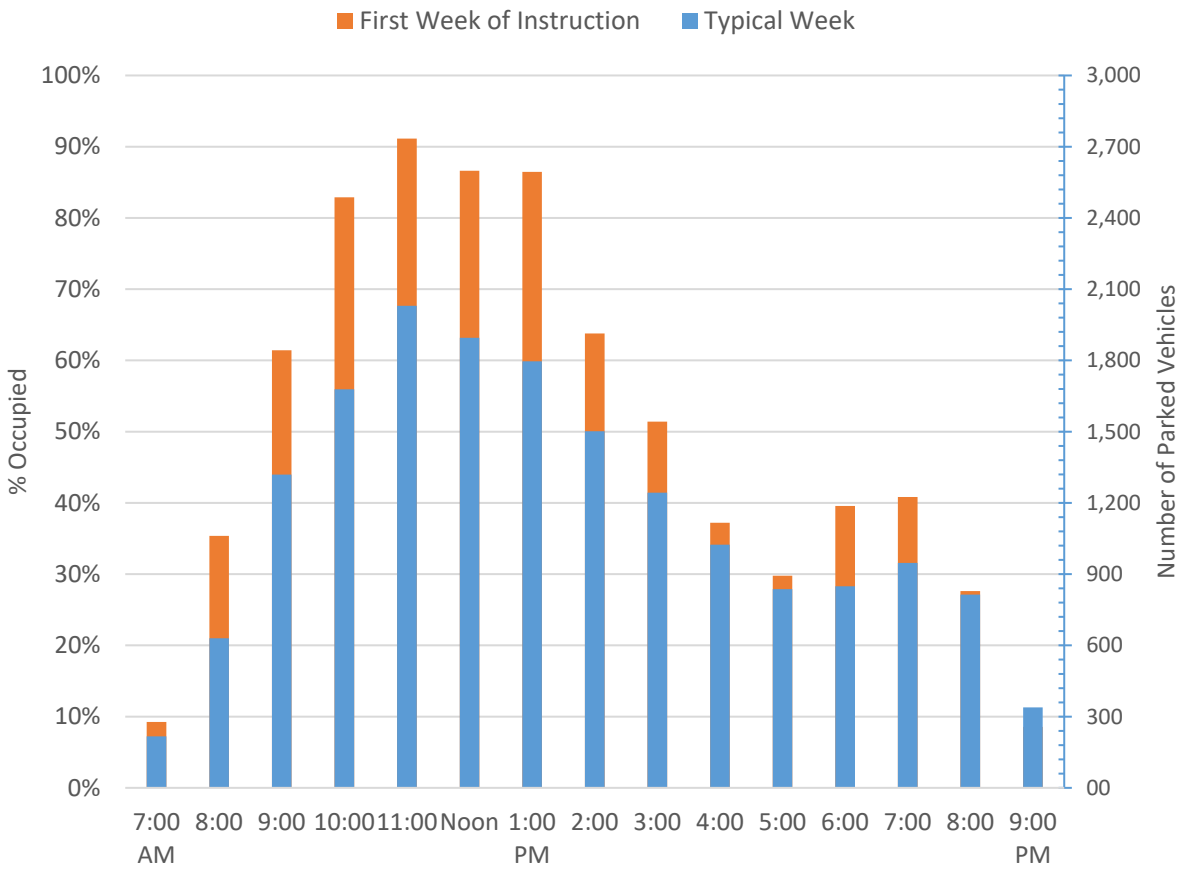
Source: Fehr & Peers, 2018; CCSF Facilities Department, 2018; IDAX Data Solutions, 2018
"Other Parking" includes spaces reserved for Chancellor's Office, Police Vehicles, Loading Zones, or other restricted uses. On-street parking within the campus is included in the counts for East of Frida Kahlo Way.

Currently, the roughly 3,000 spaces available at CCSF provide adequate supply to meet demand throughout the year. However, demand does fluctuate widely from the beginning of the academic semester to the end of each semester; it also varies by time of day. Based on data collected in October 2017, April 2018, and May 2018, **Figure 3** shows parking demand on a typical weekday[1] is highest during the mid-day periods. The peak parking demand spans from 11:00 AM to 2:00 PM, with the highest demand from 11:00 AM to 12:00 PM. In addition, based on data collected in August 2018 during the first week of instruction, parking demand is substantially higher during that time; counts taken in August were on average 36 percent higher than those taken during May 2018. **Figure 3** illustrates parking occupancy by time of day and school year by hour.

Most areas east of Frida Kahlo Way and in the Upper Reservoir were well-utilized during both the first week of school and during a more typical week, however occupancy in the Lower Reservoir peaked at only 20 percent of spaces occupied in May, compared to a peak of 82 percent occupancy at 11:00 AM during the first week of instruction. Data collected in May and August of 2018 are included as **Appendix A.**

[1] Typical weekday is defined as a weekday after the first two weeks of instruction during the Fall or Spring Semester. This report uses counts collected in May 2018; counts were validated to occupancy during the 11AM hour at both the Lower Reservoir Lot and Upper Reservoir Lot during additional weeks in April and October; May counts were found to be typical (within 3 percent of October counts).

Figure 3: Parking Occupancy by Time of Day, First Week of Instruction vs. Typical Week



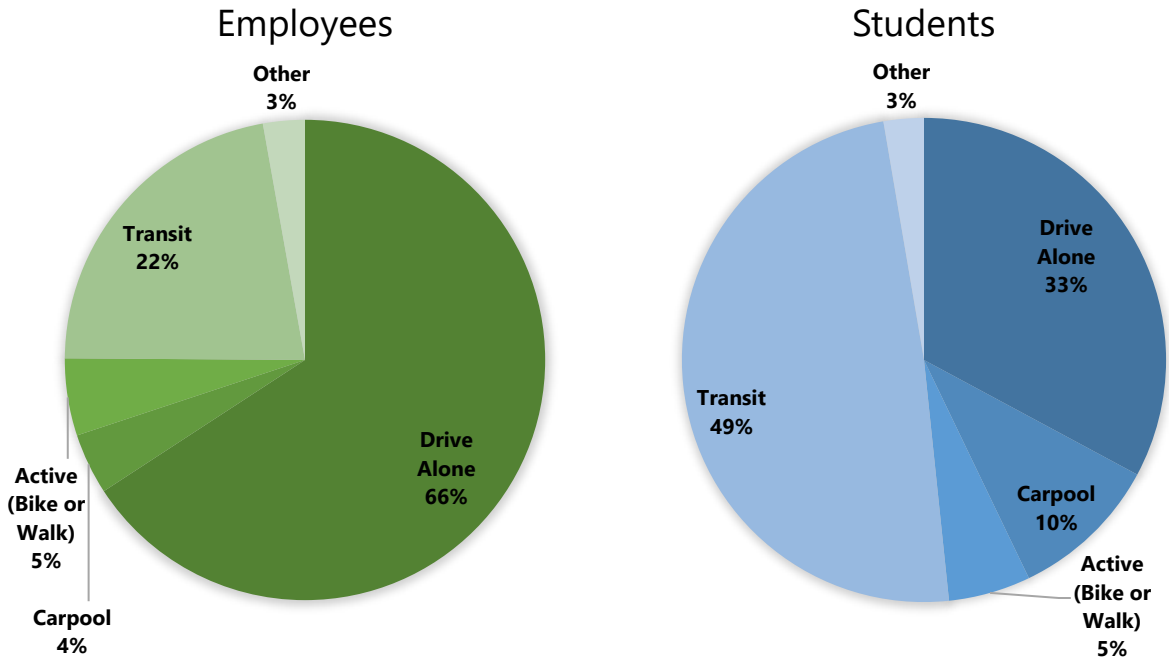
2.4 Existing Transportation Mode of Travel

Two online surveys were conducted to determine how students and employees currently travel to CCSF: an employee survey was conducted in Summer 2018, with a student survey following in Fall 2018. The survey asked individuals for their primary means of travel to the campus, their typical arrival and departure times, and questions about why they choose to travel the way they do. Surveys were conducted using the online survey platform SurveyMonkey, and were promoted via email to all employees (for the employee survey) and all registered students at Ocean campus (for the student survey). As an incentive, a $5 gift card was offered to the first hundred responses to each survey. The survey garnered over 400 employee responses and over 2,000 student responses, representing a 15-20 percent sample of the population; as such, the number of responses is believed to represent a well-rounded profile of the campus population.

2.4.1 Mode of Travel

Overall, CCSF employees have a drive alone mode share of around 66 percent; an additional 4 percent carpool to work. In comparison, only around a third of students drive alone and ten percent carpool, with a larger share of them using transit (approximately 50 percent). A modest share (<10 percent) of employees and students use other modes like walking and bicycling (~5 percent), taxi, or Lyft/Uber (~3 percent). These findings are shown in **Figure 4**. Full results of the employee and student surveys are attached as **Appendix B** and **Appendix C**, respectively.

Figure 4: Mode of Travel by Population



2.4.2 Home Location

By mapping the home location of CCSF students and employees, as well as only those who drive or carpool, a few patterns emerge. The majority of both employees and students live within the City of San Francisco, with many living in the zip codes closest to CCSF. **Figure 5** illustrates employee home locations throughout the Bay Area and **Figure 6** illustrates student home locations within the City of San Francisco.[2] However, as shown in **Figure 7**, which shows survey responses indicating the employee drove alone, there are a significant number of employees (around 5 to 10 percent of all survey respondents) who live near campus

[2] Figure 6 shows full-time students only; however, all other data collection efforts included any student enrolled in at least one class at Ocean campus.

(within 3 miles) and drive to work. This likely reflects that transit service, while available, would take more time than driving. Additionally, responses to questions about why individuals drive indicate that many times the convenience of driving extends to other aspects of life: running errands, picking up or dropping off family members, etc; these issues are further discussed later in this report.

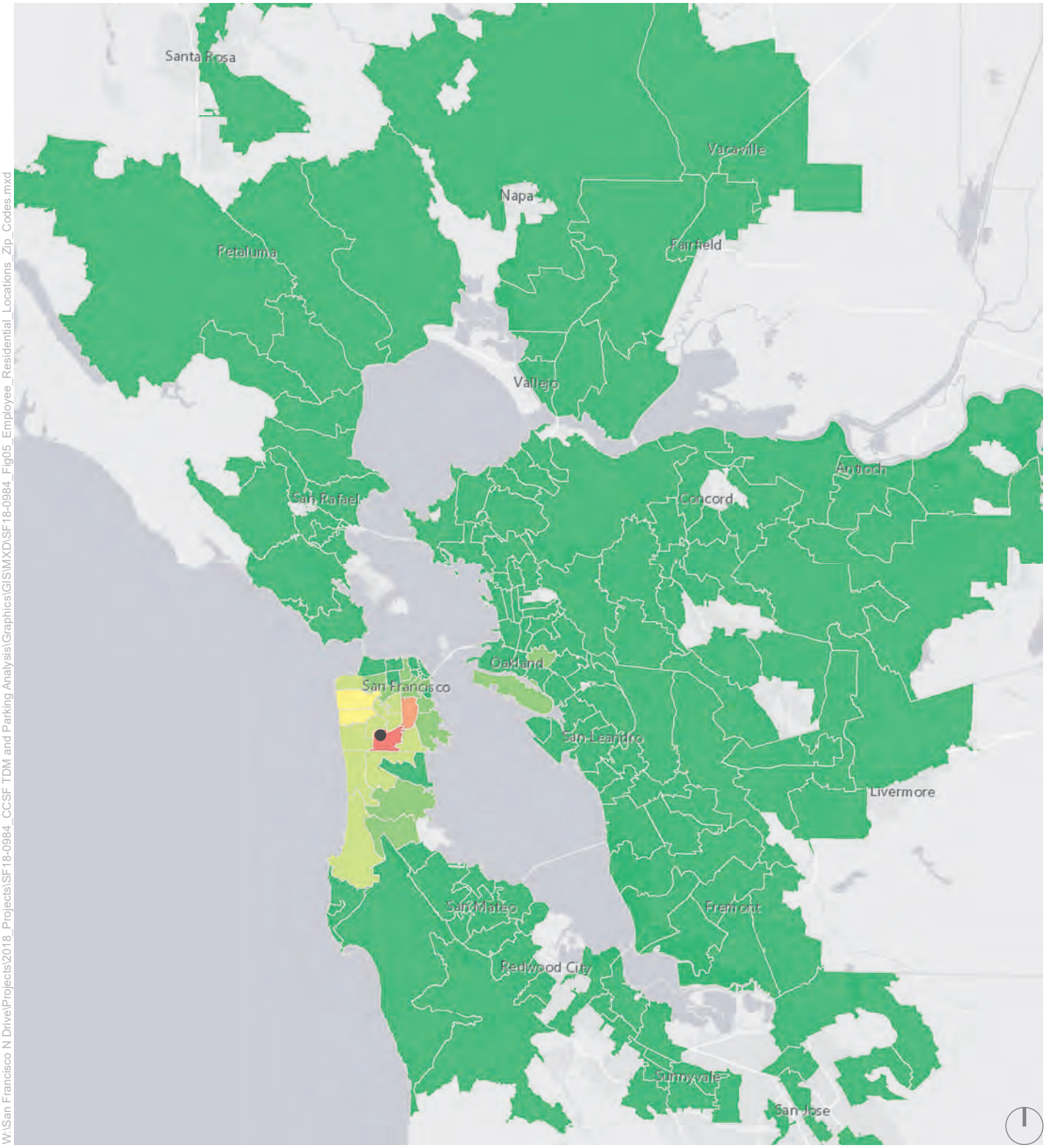
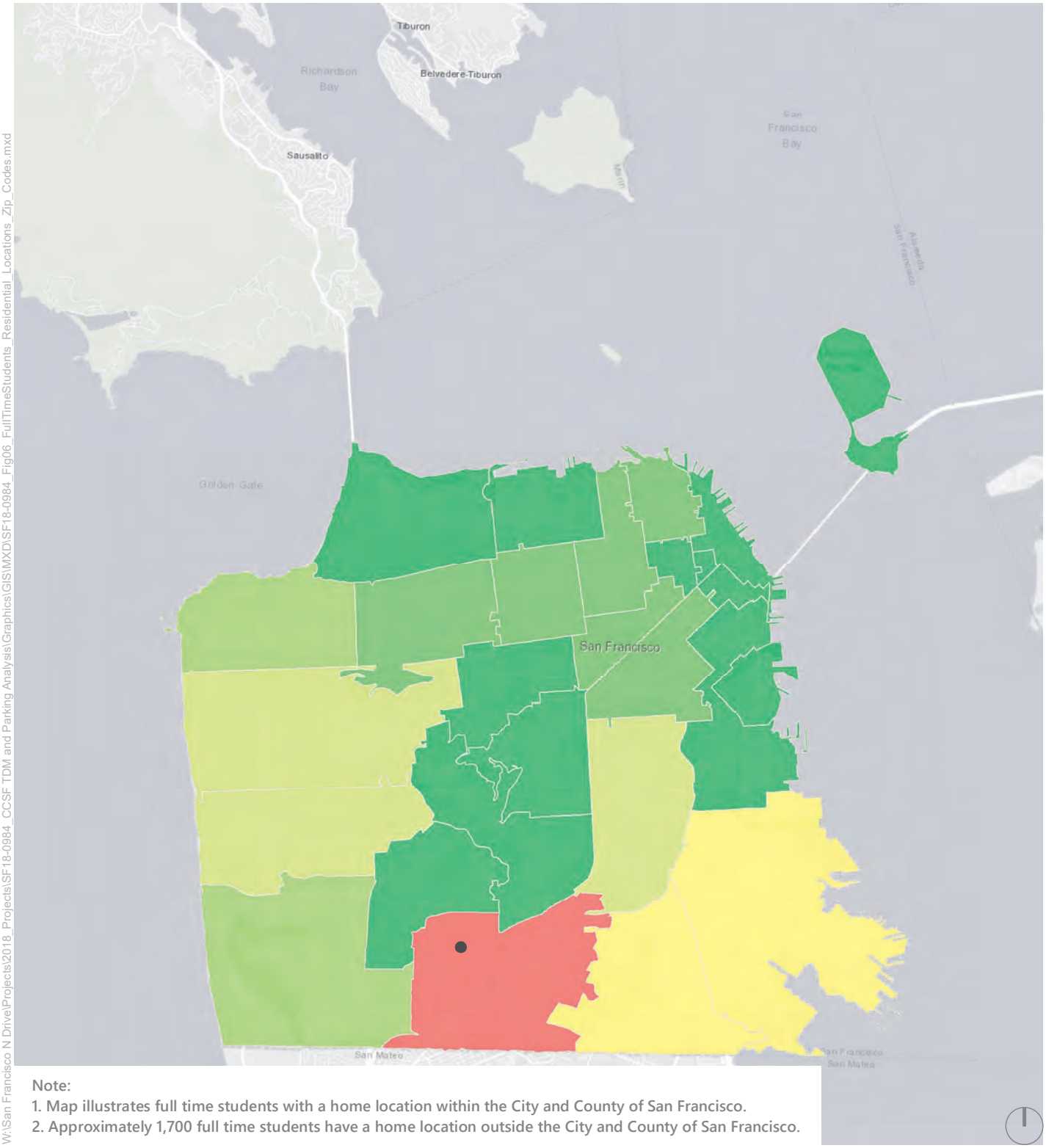


Figure 5

Employee Home Location by Zip Code



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Note:
1. Map illustrates full time students with a home location within the City and County of San Francisco.
2. Approximately 1,700 full time students have a home location outside the City and County of San Francisco.

Figure 6

Full Time Student Home Location by Zip Code

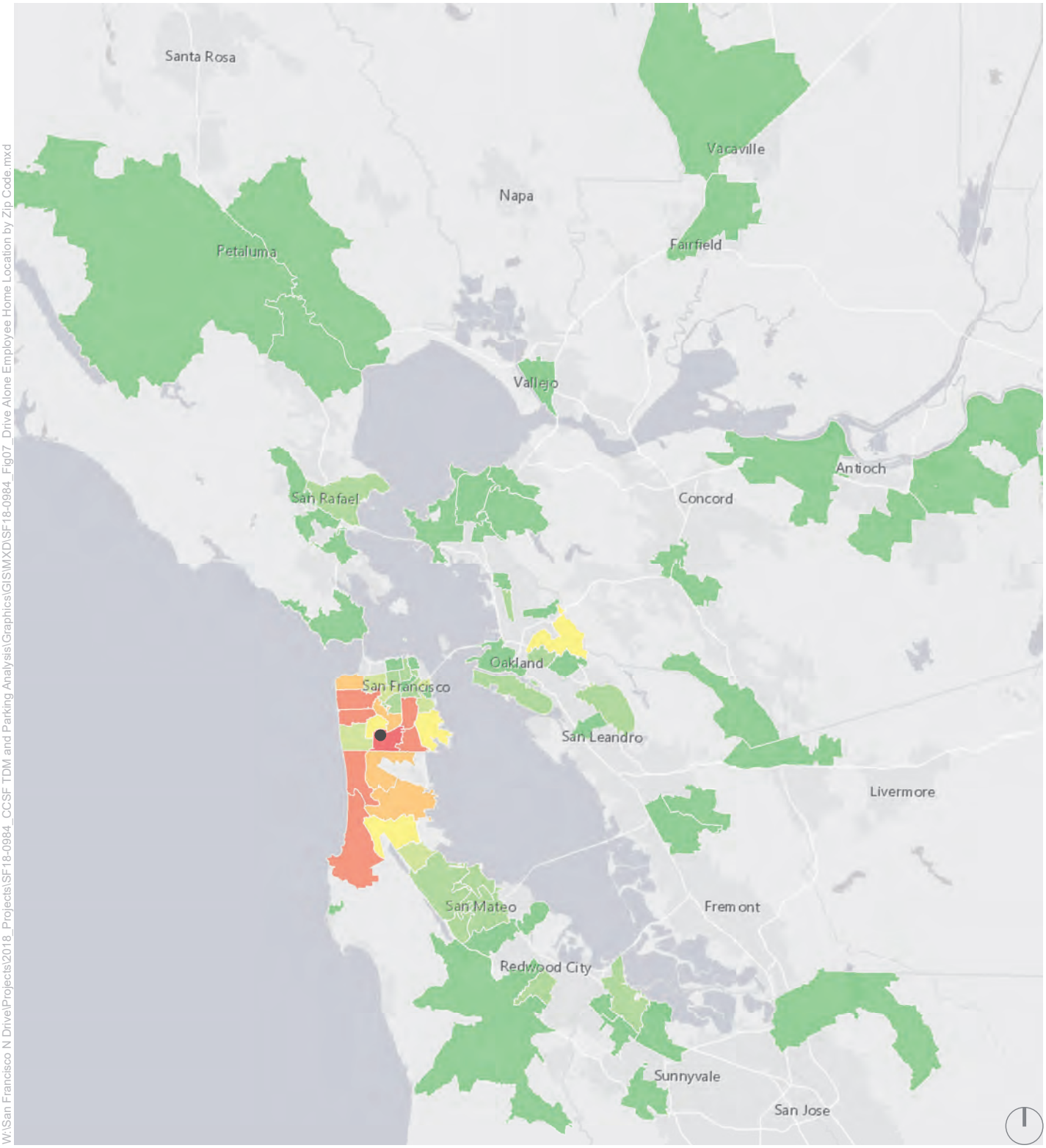

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Figure 7

Drive Alone Employee Home Location by Zip Code

2.4.3 Transportation Concerns

In addition to general demographic information, the survey asked about some of the most common transportation barriers faced by both employees and students. Generally, these barriers fall into four groups: travel time/commute time, cost, physical barriers such as long distances or safety concerns, and all other concerns (including family duties, students needing their car for work, etc). **Figure 8** shows employee responses to questions about their primary concerns, while **Figure 9** summarizes student responses to the same questions.

Figure 8: Employee Transportation Barriers and Concerns

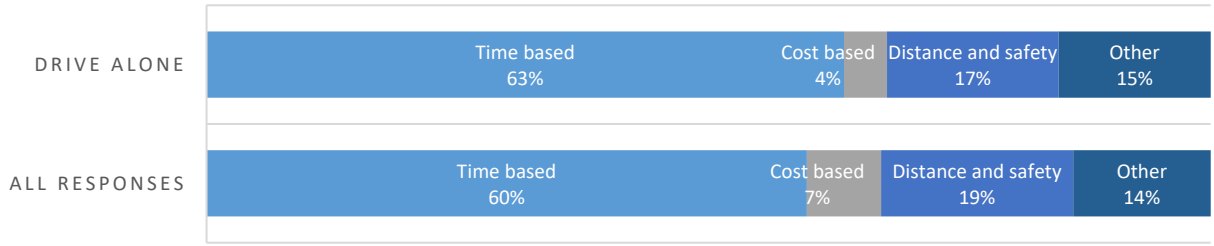
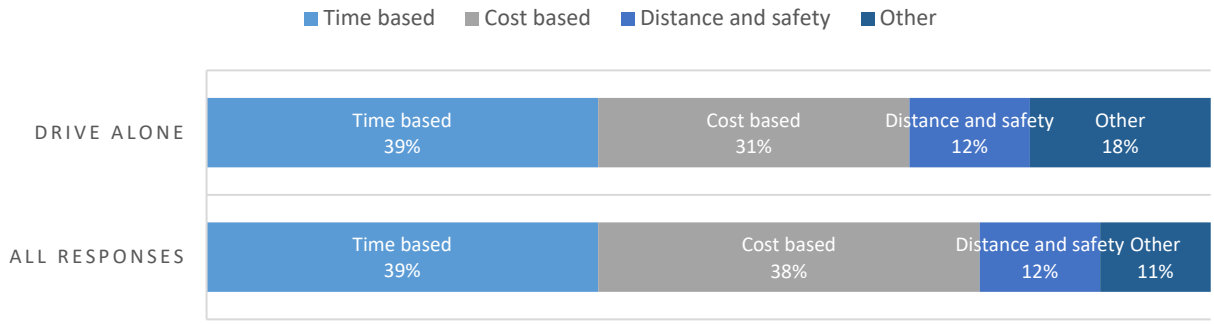


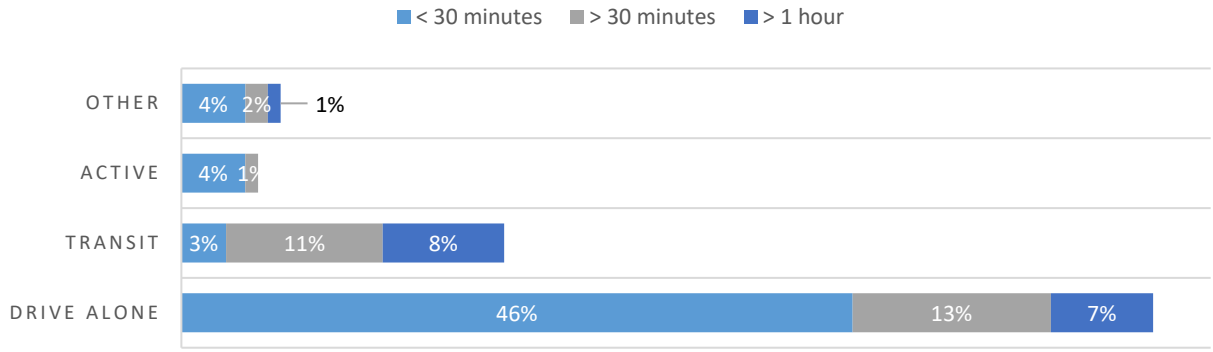
Figure 9: Student Transportation Barriers and Concerns



Generally, employees are very sensitive to the amount of time their commute takes, with nearly two-thirds of respondents listing it as their primary concern. In contrast, while students also indicated they were concerned with travel times, they were also very concerned with the cost of travel. This could include the cost of riding transit, parking, etc. Distance, safety, and other concerns such as trip chaining (making multiple stops during the commute) were also substantially important to both groups. Notably, concerns and barriers were similar for drivers and for all other responses, with non-drivers slightly more likely to be concerned with their commute cost than drivers.

The employee sensitivity to factors like commute travel time likely explains the high auto mode share, as shown in **Figure 10**. While most people who drive have a commute less than 30 minutes in length, individuals using transit are much more likely to have a longer commute, with eight percent of all employees spending more than one hour taking transit to work. While **Figure 10** does not indicate whether individuals who currently drive or take transit would spend more or less time commuting while using another mode, it does reflect a pattern that corroborates one of the primary comments received via the survey: that for many employees and students, using transit would substantially increase their commute time.

Figure 10: Employee Travel Time by Mode



Finally, the survey provided a chance for respondents to list their general concerns and provide comments and input on travel options to and from campus. Full comments are included in **Appendix B** and **Appendix C**; however, six general themes arose, as summarized in **Table 2.** While several of these comments cannot be fully addressed through transportation demand management or parking management, others helped to inform the selection of strategies that may benefit the CCSF community.

Table 2: Common Survey Comments

Comment Theme	Common Employee Response	Common Student Response	Within Scope of TDM Plan?	Within Scope of Parking Plan?
Parking Cost & Availability	Very negative response to CCSF not providing free parking to employees	Mostly concerned with affordability of parking	No	Yes
Concern with Balboa Reservoir Development	Generally driven by its effect on parking	Generally driven by its effect on parking	No	Yes
Concerns with safety	Primarily surrounding journey to BART, especially when working late hours	Primarily surrounding journey to BART	Yes	No
Concerns with accessibility	Concerns with transporting class materials and personal mobility	Very few responses	Yes	Yes
Travel time and convenience	Major concern, and often listed as the primary reason for their mode choice	Major concern, and often listed as the primary reason for their mode choice	Partial	No
Escorting kids / additional stops	Primarily named family duties	Primarily named work/schedule issues	No	No

Source: Fehr & Peers, 2018; Employee and Student Travel Survey, 2018.

2.5 Community Outreach Event

In addition to the online survey, Fehr & Peers conducted an outreach event targeting students and employees on-campus. This event occurred in the Student Union on Thursday, November 29th 2018.[3] Students and employees passing by the outreach table were asked to share their thoughts on transportation issues they face, as well as CCSF, and indicate how they would prioritize transportation programs. This event reached around 200 individuals, most of them students.

[3] While outreach was planned to occur in RAM Plaza, heavy rain on the day of the event lead to relocation to inside the Student Union.

Outreach Event, November 2018

Table 3 summarizes the transportation mode used by respondents, and the total number of responses for each mode; the mode of respondents to the outreach event was generally similar to the results of the student and employee surveys, although the share of individuals using transit was slightly higher.

Table 3: Outreach Results: How do you get to Campus?

Mode	Students		Employees	
Drive Alone	44	26%	7	70%
Carpool	8	5%	0	0%
Transit	104	61%	3	30%
Dropped off / Picked up	7	4%	0	0%
Bike or Walk	7	4%	0	0%
Total	**171**	**100%**	**10**	**100%**

Source: Fehr & Peers, 2018
Note: Dropped off / Picked up includes both personal vehicles and Uber / Lyft rides.

Individuals who replied that they drove or carpooled to campus were then asked whether they would change the way they travel if parking became more difficult to find, such as if the supply were decreased. Around 60 percent of current drivers, or three in five, indicated they would change how they travel if parking were less readily available on campus (**Table 4**). This indicates that a reduction in parking supply at CCSF could potentially lead to fewer driving trips. While this question did not include an option for potentially choosing a different school, there may be some students whose enrollment at CCSF is contingent on ease of parking. However, as discussed below, student participants generally valued transit access and educational facilities above parking.

Table 4: Outreach Results: If Parking On Campus were More Difficult to Find, How Would you Travel?

Mode	Students		Employees	
Continue to Drive or Carpool	21	36%	3	38%
Dropped off / Picked up	5	9%	0	0%
Transit	28	48%	5	63%
Bike or Walk	4	7%	0	0%
Total	58	100%	8	100%

Source: Fehr & Peers, 2018
Note: Dropped off / Picked up includes both personal vehicles and Uber / Lyft rides. This question was posed only to individuals who responded that they drove or carpooled to campus. Not all participants answered at every board.

To help inform how CCSF should allocate resources for transportation, respondents were asked how they would distribute funds across different potential programs. Participants were given five "dots", each representing CCSF's investment in a TDM and/or Parking program; they placed the dots however they thought the resources would best be allocated. Results, tallying the total number of "dots" in each category are shown in **Table 5**. Generally, students had the strongest levels of support for improved connections to BART and Muni (such as better access pathways, lighting, crosswalks, and improvements to bus stop facilities) and subsidizing transit passes. Employees were most interested in improving connections, but also providing safety improvements (such as enhanced lighting on key pathways, or adjusted signal phasing at Ocean Avenue and Frida Kahlo Way) and proactively managing parking, particularly during the busiest times of the year.

Table 5: Outreach Results: How should CCSF Allocate Available Resources to Transportation?

Mode	Students		Employees		Total	
Improving connections to BART and MUNI	**236**	**29%**	**12**	**24%**	**248**	**29%**
Subsidized transit passes for all students	**218**	**27%**	8	16%	**226**	**27%**
Safety Improvements	118	15%	**13**	**26%**	131	15%
Parking Management	115	14%	**11**	**22%**	126	15%
More Bicycle infrastructure	56	7%	2	4%	58	7%
Encourage carpooling	49	6%	1	2%	50	6%
Other: Housing	6	1%	0	0%	6	1%
Other: TNC	1	0%	2	4%	3	0%
Other: More Parking	2	0%	0	0%	2	0%
Other: Subsidized passes for employees	0	0%	1	2%	1	0%
Total	801	100%	50	100%	851	100%

Source: Fehr & Peers, 2018
Note: Responses scoring more than 20 percent are shown in **bold**.

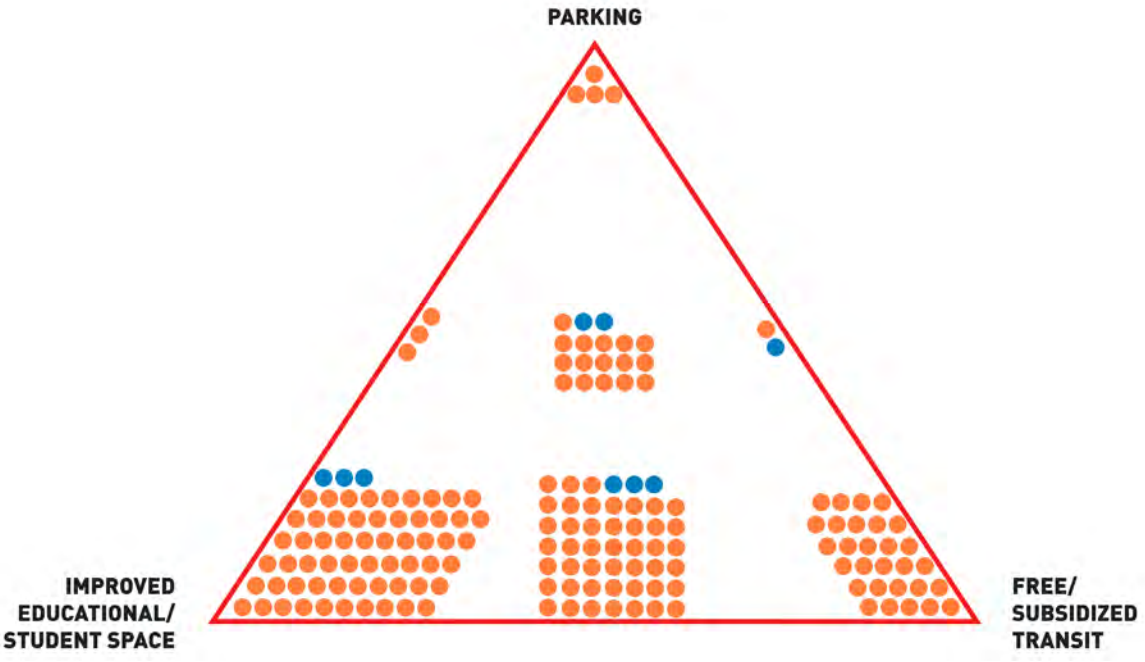
Similarly, an additional question asked students to weigh in on a College-wide Muni pass program, such as that offered by San Francisco State University, which would provide a Muni "M" pass to all students meeting some enrollment threshold (likely full-time or half-time). This would be funded through a new student fee, which would apply to all students.

Just over half of respondents indicated they would definitely like to have such a program, with 23 percent indicating they had no interest. The remainder of responses were primarily concerned with the effect of a student fee on a population that largely does not pay substantial fees or tuition; the cost of a semester Muni pass could, for instance, be more than the cost of a semester's tuition for many students. Several students indicated they would participate only if the program included BART, or if it were made into an opt-in program.

Finally, to assess how important students felt transportation barriers and parking are relative to other potential facilities projects, such as educational and student space, participants were asked to indicate on a three-sided figure roughly how they would prioritize parking, free/subsidized transit, and improved educational and student space. An image of the final distribution is shown as **Figure 11**; generally, a plurality of students (38 percent) would rather see investment focused entirely on educational and student spaces on campus. However, just over half of respondents indicated that they would like some level of investment

in transit subsidies. In contrast, only 15 percent of students (and one-third of employees) indicated they wanted any portion of resources to be dedicated to providing parking at the school.

Figure 11: How Should CCSF Allocate Its Resources?



Respondents were asked where they felt the "balance" between these three priorities lies. Stickers placed in the middle indicate that the three are roughly equal, and those placed between two priorities along the edge indicate that the respondent believed those two priorities important, but not the third. Blue responses indicate faculty and staff.

2.6 Summary of Findings

Based on the online surveys and in-person outreach event, Fehr & Peers staff have summarized findings into the following themes:

1. **CCSF Relies on Public Transit**: While most employees drive to work, a substantial number use BART or Muni to commute. Among students, half of trips to campus are made on transit. This occurs in spite of the distance from campus to BART, which many students and employees cited as a barrier; many comments also indicated that some respondents felt unsafe walking to the BART station.
2. **Time and Convenience are Key Drivers of Behavior**: Among all populations, but particularly employees, the amount of time spent commuting is a key consideration in making travel choices. While CCSF cannot address the relative travel time on different modes of travel, it can help individuals plan a more seamless transit trip, or perhaps try walking or bicycling. Overcoming this

barrier is difficult, and will require proactive outreach and marketing. Even so, a substantial share of the population will likely continue to drive, even if parking becomes less readily available.

3. **Cost Matters, Especially to Students:** Students indicated that the cost of traveling to and from classes was a major concern. This was shown in both direct survey responses, as well as in student reactions to potential programs to help subsidize the cost of transit. Because CCSF students are often drawn in by the tuition-free program, they may be even more cost sensitive than other populations.
4. **Many Drivers Live Near Campus:** Among both employees and students, many drivers live within two to three miles of campus, and could potentially walk or bicycle to CCSF. While this option is not available to many people due to mobility or accessibility concerns, or because employees must carry materials, promoting bicycling and walking and creating a safe environment connecting campus to the surrounding neighborhoods could help accommodate more active travel.
5. **Transportation is Important, but Secondary to Education:** While this plan focuses on improving transportation options, it is key to remember that while transportation is important to students, it is often secondary to their overall student experience. While commuting to and from campus may be difficult, or a source of stress, students generally indicated that they wanted to see balance between transportation investments and investments to facilities and the student experience.
6. **Parking is Important to Employees, but Students Value Transit Access:** Employee responses generally placed a high value on parking as an employee benefit. However, while students also value the availability of parking, they were less concerned with future changes, and more willing to shift to other modes if parking were to become more difficult to find. In addition, because students are more price sensitive, changes to the cost of parking will likely lead them to change transportation mode at a higher rate than employees.

Chapter 3. TDM Plan, Implementation, and Mode Share Targets

Using data gathered from the online survey, community outreach, and discussions with CCSF administrative staff, Fehr & Peers has compiled a list of potential TDM strategies that could help manage the number of students and employees driving alone to campus. Based on the themes identified above, strategies are grouped into the following objectives:

1. **Maintain Equitable Access to a CCSF Education:** Equity and access are key values to CCSF and its mission. This objective suggests secondary strategies to support students with limited financial resources.
2. **Create a variety of affordable options to encourage use of transit**: CCSF is in a transit-rich city; however, additional support can help students and employees address key barriers such as long walks, extended wait times, or high costs of transit passes.
3. **Support Walking and Bicycling, especially for those living within three miles of campus:** Many students and employees live within bicycling distance of campus, but commute via car. These strategies help promote walking and bicycling.
4. **Advertise and Incentivize Sustainable Transportation:** The barriers to changing transportation behavior are high, so direct support and encouragement are key elements to the TDM Plan
5. **Manage Existing Parking Supply:** Through carefully adjusting pricing, revising the permit system, and more stringent enforcement, CCSF can manage demand for parking spaces. Additional measures to help shift driving behavior by faculty and staff may be necessary, including pricing employee parking.

3.1 Transportation Strategies

Individual strategies to help meet each objective have been further divided into two groups: Core TDM Measures, or measures that provide support at a low cost to CCSF, preserving resources for other projects; and additional TDM measures, which include options that are higher cost, but may be substantially more effective at reducing the number of vehicle trips to campus. Each measure also includes an estimate of its effectiveness, based on the California Air Pollution Control Officers Association (CAPCOA) publication *Quantifying Greenhouse Gas Mitigation Measures*. CAPCOA represents a review of research, and includes

data-backed strategies to reduce vehicle miles traveled and associated vehicle trips and greenhouse gas emissions.

3.1.1 Core TDM Measures

Core TDM measures include measures that have a low to moderate annual cost *and* meet at least two of the following criteria:

- Address the key commute barriers named by students and staff, including cost, commute time, and safety/walking comfort.
- Provide a quantifiable reduction in drive-alone trips to campus.
- Assist drivers who live within walking or biking distance of CCSF to adopt walking, bicycling, or other active modes.
- Support CCSF's already high levels of transit use

Table 6 summarizes the measures in the TDM plan, and categorizes them by their potential to reduce drive alone trips. Where applicable, potential mode share reductions are provided based on CAPCOA; other measures largely serve to support other measures, and may not have a quantifiable effect on travel behavior. In general, measures will be most effective if marketed to individuals who live near existing transit service, or who drive alone and live within a few blocks of campus. Through monitoring and ongoing adjustment to programs, a TDM Coordinator can identify how best to adapt each strategy to CCSF's students and employees.

Table 6: Core TDM Measures

Measure	Detail	Student Drive Trip Reduction Potential	Employee Drive Trip Reduction Potential
Maintain Equitable Access to a CCSF Education			
Revise permit system to reflect student need	Provide a pathway for students with financial hardship to obtain a reduced cost parking pass, or to receive priority for a parking pass	0%	0%
Assist students in applying for Muni Lifeline passes or other low-income programs	As part of the transportation coordinator position, assist students with application for Muni lifeline service and other subsidized transit pass programs	2%	0%

Table 6: Core TDM Measures

Measure	Detail	Student Drive Trip Reduction Potential	Employee Drive Trip Reduction Potential
Create a Variety of Affordable Options to Encourage Use of Transit			
Install real-time transit information at key locations	Provide real time information at the primary transit center on Frida Kahlo way, but also on screens in central buildings (Student Union, Cafeteria, etc)	Supportive	Supportive
Improve connections with BART station by working with the City to address sidewalks, crosswalks, and other issues	Primary focus should be around direct, safe, secure access to BART station and Muni bus stops, including enhanced lighting, shelters, etc. May require coordination with SFMTA.	<1%	<1%
Support Walking and Bicycling			
Provide additional secure bicycle parking and lockers	Provide additional covered bicycle parking or bike station on campus at location easily accessible from multiple locations, ideally not requiring a bike ride up a steep hill	<1%	<1%
Provide bicycle repair stations at key Campus locations	Provide bicycle repair at central location with heavy bicycle activity	<1%	<1%
Improve signage and wayfinding, particularly for accessible pathways	To help connect the campus with the surrounding streets, improve the most commonly used accessible pathways through campus, and maintain a pedestrian-first feel at common gateways to campus. Also include visible signage supporting bikeways.	Supportive	Supportive
Provide additional improvements to the bicycle and pedestrian network on campus	Provide bicycle lanes or marked bicycle pathways, and maintain high quality sidewalks and pathways through campus for pedestrians.	1%	1%

Table 6: Core TDM Measures

Measure	Detail	Student Drive Trip Reduction Potential	Employee Drive Trip Reduction Potential
Advertise and Incentivize Sustainable Transportation			
Hire a dedicated on-site transportation coordinator and engage in proactive outreach to students and employees	Hire, or provide existing FTE with authority to advertise, improve, and host events promoting sustainable transportation. Common marketing events may include bike/walk/roll days, issuing climate challenges to reduce drive alone trips, assisting individual students and employees with trip planning, and helping employees enroll in commute benefits.	5%	5%
Expand transportation resources on CCSF website	Provide direct, easy-to-use links to transit schedules and fare information; advertise potential student discounts on transit; advertise supportive programs such as Guaranteed Ride Home and Campus Escort services.	Supportive	Supportive
Provide transportation information to students when they enroll	Upon enrollment each semester, either direct students to a transportation website, or provide opportunities for them to discuss transportation options with CCSF staff.	Supportive	Supportive
Manage Existing Parking Supply			
Establish drop-off and pick-up zones	By providing additional drop-off and pick-up zones, the school can facilitate vehicle trips that do not require parking supply. This measure works in conjunction with changes to parking permitting, supply, or cost.	Supportive	Supportive
Create and advertise a carpool program	Partially included in transportation outreach; provide dedicated platform or partner with platform to advertise carpooling opportunities, and perhaps allow for preferential carpool parking	5%	*Included in "Hire dedicated on-site transportation coordinator" reduction. Less effective for employees due to free parking benefit.*

Table 6: Core TDM Measures

Measure	Detail	Student Drive Trip Reduction Potential	Employee Drive Trip Reduction Potential
Adjust student parking prices	Increase the cost of student parking as the parking supply decreases. This reduction assumes that daily parking costs to students would increase from $5 per day to $7 per day.	5.5%	N/A
Revise permit system	Consider a suite of potential changes to how parking permitting operates on campus, ranging from further restricting certain spaces for employees or students, providing priority permits based on student need or class schedules, or limiting the number of permits issued. This could potentially be a means of reducing student parking demand without necessarily increasing parking cost, but would require active management of the program	Varies	Varies

Source: Fehr & Peers, 2018; CAPCOA Quantifying Greenhouse Gas Mitigation Measures, 2010

The total expected reduction in drive-alone trips from these core measures would be **up to a 19 percent reduction** in student drive alone trips, and **up to an 8 percent reduction** in employee drive alone trips. These totals are slightly lower than the simple addition of all measures, due to diminishing effectiveness as additional people shift to other modes; they also represent the high end of the range of expected reductions in drive alone trips.

3.1.2 Additional TDM Measures to Consider

The following TDM measures, summarized in **Table 7**, meet the criteria for the core measures, but would result in a higher cost to CCSF on an annual basis. The highest financial cost measures, however, also have high levels of support based on findings from outreach. For example, providing subsidized Muni passes is estimated to reduce student drive alone trips by up to 10 percent; however, it would cost up to $240 per student per semester. Eligibility requirements would need to be determined, likely based on the number of courses a student is enrolled in for the quarter. Implementation of a bulk transit pass program would require ongoing negotiations with SFMTA, as Muni currently does not have an option for bulk pass purchasing at a reduced cost to employers or institutions; other organizations who offer this benefit have engaged in one-on-one negotiations with SFMTA staff.

These measures also include subsidized memberships to two services: carshare, which allows employees access to a car for errands or quick trips during the day, and bikeshare or scootershare, which can help connect the campus to Balboa Park BART Station, as well as potentially encouraging students and employees who live near the campus to bicycle or scoot to CCSF.

Finally, this set of measures includes charging a daily price for employee parking. While this measure is currently precluded under existing labor contracts, parking pricing is an effective way to manage parking supply in cases where there is significant unserved demand.

Table 7: Additional TDM Measures

Measure	Detail	Student Drive Trip Reduction Potential	Employee Drive Trip Reduction Potential
Create a Variety of Affordable Options to Encourage Use of Transit			
Provide Student Muni Pass Program	Provide Muni pass to all full-time students, via either subsidy or student fee	10%	0%
Provide Employee Muni Pass Program	Provide Muni pass to all full-time employees via subsidy for transit benefits	0%	10%
Support Walking and Bicycling			
Provide bike share (or scooter share) membership to students & employees	Provide bike or scooter share subsidies to students and employees, allowing them to use services such as LimeBike or scooters to help connect to public transit. This measure would be implemented at the time that such services are available at Ocean Campus.	1%	1%
Manage Existing Parking Supply			
Provide space for carshare vehicles and subsidize carshare for employees	Allocate parking spaces on campus for ZipCar or similar services, and provide subsidized memberships to employees. These services allow for the ability to use a car for official business or errands, even if the employee did not drive to work that day.	0%	1%

Table 7: Additional TDM Measures

Measure	Detail	Student Drive Trip Reduction Potential	Employee Drive Trip Reduction Potential
Price employee parking appropriately	Charge employees a daily fee to park on campus, in conjunction with implementation of additional transportation benefits and support. Consider providing promotional pricing for carpooling or off-peak parking.	0%	5%
Provide managed parking during peak demand periods	Because parking demand peaks during the first week of instruction, provide valet parking at parking lots to help increase effective supply during peak times. Cost of parking should be adjusted accordingly during these times.	Supportive	Supportive
Provide shuttle to BART during peak demand periods	During the first week of each semester, when parking demand is highest, provide shuttle service from Balboa Park BART station to Cloud Drive to help reduce parking demand.	Supportive / up to 5% during peak demand	Supportive / up to 5% during peak demand

Source: Fehr & Peers, 2018; CAPCOA Quantifying Greenhouse Gas Mitigation Measures, 2010

Incorporating these additional TDM strategies into the CCSF TDM Plan would increase the potential reduction in drive alone trips to up to a **27 percent reduction** for students, and up to a **22 percent reduction** for employees. These totals are slightly lower than the simple addition of all measures, due to diminishing effectiveness as additional people shift to other modes; they also represent the high end of the range of expected reductions in drive alone trips.

3.2 Mode Share Targets

To establish mode share targets, we have assessed the reduction potential of both the core TDM measures and the additional measures using data from CAPCOA. As shown in **Table 8**, the TDM Plan could result in an average student vehicle mode share of 24 to 27 percent, and an employee vehicle mode share of 52 to 61 percent. As such, this TDM Plan should set an initial (short-term) mode share target of **27 percent** for students and **61 percent** for employees. As enrollment is expected to increase and parking supply reduced due to proposed changes on campus (described in the next section), CCSF should aim to reach a more aggressive goal by completion of the Facilities Master Plan, of **25 percent vehicle mode share** for students and **52 percent** for employees.

Table 8: Vehicle Mode Share Targets

Mode	Students		Employees	
	Core Measures	Core + Additional	Core Measures	Core + Additional
Existing Drive Alone Mode Share	33%		66%	
Reduction due to TDM Plan	19%	27%	8%	22%
Vehicle Mode Share Target	27%	24%	61%	52%

Source: Fehr & Peers, 2018
Note: Vehicle mode share refers to drive alone and carpool users.

Chapter 4. Parking Analysis

While reducing the number of driving trips to campus would result in less vehicle congestion in local neighborhoods, fewer greenhouse gas emissions, and lower parking demand, one of the primary concerns voiced by CCSF employees, students, and leadership has been the management of parking supply and demand in light of expected campus development and operational changes. These changes include:

- Construction of a Performing Arts and Entertainment Center (PAEC), removing up to 760 parking spaces in the Upper Reservoir parking area
- Construction of the planned Balboa Reservoir Housing development at the Lower Reservoir parking area, removing 1,007 parking spaces
- Enrollment increases of up to 25 percent
- Implementation of the TDM Plan, as described in Chapter 3.

These changes have been consolidated into three key scenarios analyzed below:

- Scenario 0: Baseline Conditions (i.e., no changes to campus or Lower Reservoir)
- Scenario 1: Baseline Conditions + PAEC
- Scenario 2: Baseline Conditions + Balboa Reservoir Housing
- Scenario 3: Baseline Conditions + PAEC + Balboa Reservoir Housing

For each of these scenarios, parking was analyzed based on an enrollment growth of 25 percent, both with and without the core and additional TDM measures in place. Reduction in parking demand due to TDM measures assumed that reductions in the drive alone rate would correspond to similar reductions in parking rates.

4.1 Parking Demand

For this analysis, baseline parking demand was calculated using two data sources: employee and student survey data, and counts of parking occupancy during May 2018 (average weekday) and August 2018 (first week of school). Parking demand was calculated using survey data regarding mode of travel, number of days on campus per week, and arrival/departure times, to calculate the peak parking demand during the 11:00 AM to 2:00 PM period. Counts of Full Time Equivalent (FTE) students and employees were then applied to the parking demand rates to reach an estimated peak parking demand, which was then validated to actual parking counts.

Because the survey asks for a "typical" mode, and includes a long period of time for students to report peak period arrivals (11:00 AM to 2:00 PM), it likely overestimates the share of students parked on campus during

the peak period from 11:00 AM to 12:00 PM. As an example, students arriving at 1:00 PM would be included in the peak parking demand for 11:00 AM, due to the large reporting window. **Table 9** shows results of this analysis, and a peak day parking demand of **0.15 spaces per FTE Student** and **0.43 spaces per FTE Employee** during the peak hour of the day.

Table 9: Calculating Parking Demand Rates, Peak Hour (11:00 AM – 12:00 PM) of Peak Day (Tuesday August 21, 2018)

Mode	Students	Employees
% Driving, Weighted by Days on Campus	37%	66%
% On Campus, 11:00 AM – 2:00 PM	68%	95%
Average Vehicle Occupancy	1.22	1.08
Parking Demand per FTE	0.21	0.58
2018 FTEs at Ocean Campus	12,336	2,178
Estimated Parking Demand	**2,538**	**1,260**
Total Estimated Parking Demand	**3,798**	
Actual Parking Occupied, Peak Hour of Peak Day	**2,808**	
Parking Adjustment Factor	**0.74**	
Final Peak Parking Demand per FTE	**.15**	**.43**

Source: Fehr & Peers, 2018; IDAX Data Solutions, 2018; CCSF, 2018

However, these rates were validated on the highest parking demand day of the year. Parking demand varies substantially throughout the year, as shown in **Figure 3.** An additional adjustment to account for variations between a peak day (during the first week of school) and a more "typical" day (late in the Spring semester) is shown in **Table 10**. The resulting peak hour parking demand rates based on late semester parking occupancy are **0.11 spaces per FTE student** and **0.31 spaces per FTE employee**.

Table 10: Calculating Parking Demand Rates, Peak Hour (11:00 AM – 12:00 PM) of Typical Day (Monday May 14, 2018)

Mode	Students	Employees
Demand on Peak Day	.15	.43
Actual Parking Occupied, Peak Hour of Peak Day	2,808	
Actual Parking Occupied, Peak Hour of Typical Day	2,047	
Typical Day Adjustment Factor	0.73[4]	
Typical Day Parking Demand per FTE	**0.11**	**0.31**

Source: Fehr & Peers, 2018; IDAX Data Solutions, 2018

Based on the parking demand rates calculated above, parking demand was estimated for the baseline and future enrollment scenarios without and with TDM. **Table 11** summarizes the peak parking demand and non-peak parking demand, supply and unserved demand for the base scenario (no changes in parking supply). As shown, by 2026 the Baseline conditions would result in a shortfall of 572 parking spaces during the peak week of demand; however, there would be no shortfall during a typical day. If core TDM programs are provided, Baseline conditions would result in a shortfall of 39 spaces during the first week of instruction and no shortfall during a typical day.

[4] Both employee and student parking demand were scaled down proportionately to provide a typical day demand. Employee parking demand is likely more stable throughout the academic year; however, this analysis provides a conservative / higher parking demand estimate than adjusting student parking alone.

Table 11: Baseline Parking Demand and Supply

Enrollment/ TDM Scenario	Peak Day Parking Demand (First Week of Instruction)	Non-Peak Demand (Typical Day in Semester)	Supply	Unserved Demand - Baseline Peak Day of First Week of Instruction	Unserved Demand - Baseline Typical Day in Semester
2018	2,835	2,066	3,010	0	0
2026 (25% growth) without TDM	3,543	2,583	3,010	533	0
2026, with core TDM	3,010	2,194	3,010	0	0
2026, with additional TDM	2,245	1,636	3,010	0	0

Source: Fehr & Peers, 2018; IDAX Data Solutions, 2018; CCSF Draft Facilities Master Plan, 2016

4.1.1 Scenario 1: Parking Demand with PAEC

Construction of the PAEC is anticipated to occur on the northern portion of the Upper Reservoir parking lot, and would result in removal of 760 existing parking spaces. However, the PAEC is not anticipated to generate new parking demand during the peak hour of 11:00 AM to 12:00 PM that is not otherwise accounted for by the student and employee populations; additional parking demand for performances would likely occur during the evening hours, when parking is much more readily available, as shown in Figure 3 above.

Table 12: Scenario 1 (Baseline + PAEC) Parking Demand and Supply

Enrollment/ TDM Scenario	Peak Day Parking Demand (First Week of Instruction)	Non-Peak Demand (Typical Day in Semester)	Supply	Unserved Demand - Baseline Peak Day of First Week of Instruction	Unserved Demand - Baseline Typical Day in Semester
2018	2,835	2,094	2,250	585	0
2026 (25% growth) without TDM	3,543	2,617	2,250	1,293	367
2026, with core TDM	3,010	2,223	2,250	760	0
2026, with additional TDM	2,245	1,658	2,250	0	0

Source: Fehr & Peers, 2018; IDAX Data Solutions, 2018; CCSF Draft Facilities Master Plan, 2016

Table 12 summarizes the unserved parking demand under Scenario 1, with student growth and with either the core TDM Plan or with the Additional TDM Measures. As noted above, demand fluctuates widely throughout the year; however, to accommodate the peak demand at 11:00 AM, by 2026 the loss of parking resulting from construction of the PAEC would lead to a shortfall of **367 to 1,293 parking spaces** during the 11:00 AM hour. If core TDM programs were provided, demand would be accommodated during much of the year, with a shortfall of **760 spaces** during the first week of school.

4.1.2 Scenario 2: Parking Demand with Balboa Reservoir Housing Project

Scenario 2 accounts for the Balboa Reservoir Housing Project, slated to add a new housing development to the land currently occupied by the Lower Reservoir parking lot. This would result in the reduction of CCSF parking supply by 1,007 spaces. This does not account for any future shared parking arrangements in conjunction with the Balboa Reservoir Housing project sponsors.

Table 13 summarizes the unserved parking demand under Scenario 2, with student growth and with either the core TDM Plan or with the Additional TDM Measures. As noted above, demand fluctuates widely throughout the year; however, to accommodate the peak demand at 11:00 AM, by 2026 the removal of the Lower Reservoir parking facilities would lead to a shortfall of **614 to 1,540 parking spaces** during the 11:00 AM hour. If core TDM programs were provided, there would be unserved demand for around **220 to 1,007** parking spaces during the peak hour.

Table 13: Scenario 2 (Baseline + Balboa Reservoir Housing) Parking Demand and Supply

Enrollment/ TDM Scenario	Peak Day Parking Demand (First Week of Instruction)	Non-Peak Demand (Typical Day in Semester)	Supply	Unserved Demand - Baseline Peak Day of First Week of Instruction	Unserved Demand - Baseline Typical Day in Semester
2018	2,835	2,094	2,003	832	91
2026 (25% growth) without TDM	3,543	2,617	2,003	1,540	614
2026, with core TDM	3,010	2,223	2,003	1,007	220
2026, with additional TDM	2,245	1,658	2,003	242	0

Source: Fehr & Peers, 2018; IDAX Data Solutions, 2018; CCSF Draft Facilities Master Plan, 2016

4.1.3 Scenario 3: Parking Demand with PAEC and Balboa Reservoir Housing Project

Scenario 3 provides the combined parking demand analysis for a future scenario where the PAEC and Balboa Reservoir Housing Project are both constructed and active, leading to the removal of 1,767 parking spaces on campus. This does not account for any future shared parking between CCSF and the Balboa Reservoir housing project.

Table 14 summarizes the unserved parking demand under Scenario 3, with enrollment growth and with either the Core TDM or additional TDM measures. As noted above, demand fluctuates widely throughout the year; however, to accommodate the peak demand at 11:00 AM, by 2026 this scenario would lead to a shortfall of **1,374 to 2,300 parking spaces** during the 11:00 AM hour. If core TDM programs were provided, there would be unserved demand for around **980 to 1,767** parking spaces during the peak hour.

Table 14: Scenario 3 (Baseline + PAEC + Balboa Reservoir Housing) Parking Demand and Supply

Enrollment/ TDM Scenario	Peak Day Parking Demand (First Week of Instruction)	Non-Peak Demand (Typical Day in Semester)	Supply	Unserved Demand - Baseline Peak Day of First Week of Instruction	Unserved Demand - Baseline Typical Day in Semester
2018	2,835	2,094	1,243	1,592	851
2026 (25% growth) without TDM	3,543	2,617	1,243	2,300	1,374
2026, with core TDM	3,010	2,223	1,243	1,767	980
2026, with additional TDM	2,245	1,658	1,243	1,002	415

Source: Fehr & Peers, 2018; IDAX Data Solutions, 2018; CCSF Draft Facilities Master Plan, 2016

4.2 Effects of Limited Parking Supply on Daily Demand

As discussed in Chapter 2.6, many students and employees indicated they might change their mode of travel to campus if they knew parking would be more difficult to find. Specifically, around 60 percent of both student and employee respondents indicated that they would carpool, use Lyft/Uber, walk, bike, or take transit if parking became more difficult.

Table 15 shows how many individuals would likely change mode on a daily basis, by applying this 60 percent mode shift factor to the total unserved demand for parking among employees and students under the most intensive growth scenario, including both the PAEC and the Balboa Reservoir Housing Project proceeding.[5] Based on this 60 percent shift in mode, daily unserved demand during the school year could be as few as 166 parking spaces, if all additional TDM measures are adopted, including charging for employee parking. Under a more typical TDM plan, the total unserved demand is expected to be around 400 parking spaces.

Table 15: Scenario 3 Assuming Mode Shift (Baseline + PAEC + Balboa Reservoir Housing) Parking Demand and Supply

Enrollment/ TDM Scenario	Unserved Demand, Typical Day	Employee Unserved Demand	Student Unserved Demand	Employees Shifting to Other Modes	Students Shifting to Other Modes	Predicted Unserved Demand
2018	851	282	569	169	341	**341**
2026 (25% growth) without TDM	1,374	456	918	274	551	**549**
2026, with core TDM	980	354	626	212	376	**392**
2026, with additional TDM	415	156	259	94	155	**166**

Source: Fehr & Peers, 2019

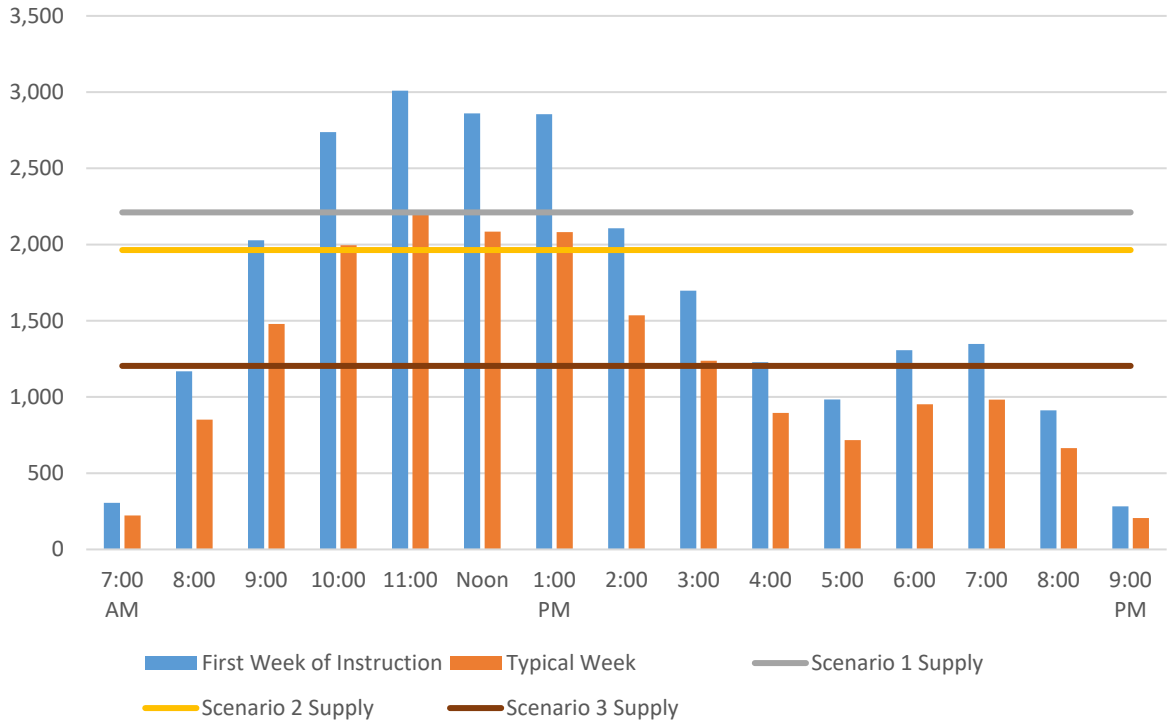
4.3 Peak vs. Average Parking Demand

As presented above, the individual scenarios result in potential unserved parking demand for hundreds of students and/or employees. However, the demand numbers presented are those for only the peak hour of demand, from 11:00 AM to 12:00 PM. As shown in **Figure 12**, under Scenario 3 supply would still be sufficient to meet demand before 9:00 AM and after 4:00 PM, even during the busiest weeks of school. Similarly, under Scenarios 1 and 2, implementation of a TDM program would lead to accommodating all estimated parking demand during most hours of the day, except for during the peak demand period at the

[5] This analysis assumes that only 60 percent of *unmet* demand would shift; for instance, rather than reducing total parking demand by 60 percent for each scenario, only the portion of demand exceeding the projected supply was reduced.

start of the school year. This analysis does *not* incorporate the potential additional mode shift due to limited parking supply from Section 4.2.

Figure 12: Projected Demand and Supply by Time of Day (25% Enrollment Increase + Core TDM Strategies)



Interpreting the data another way, under each scenario the provided parking facilities would be expected to fill by a certain time of day. Under Scenario 1, parking would fill by 11:00 AM during a typical week, and between 9:00 AM and 10:00 AM during the first week of instruction. Under scenario 2, parking would fill by 10AM during a typical week and by 9:00 AM during the first week of instruction. Finally, under scenario 3, parking would be expected to fill by 9:00 AM during a typical week, and by 8:00 AM during the first week of instruction.

The large difference in expected parking demand across the school year results in the need to more proactively manage parking facilities during the first week of school. A variety of strategies, some of which are listed in the TDM plan, can help with this. They may include:

- Advertising that parking will be in short supply during enrollment
- Providing temporary valet services to increase capacity of parking facilities
- Increasing the cost of parking for students during the first week of instruction
- Providing shuttles to and from major transit stations to help reduce demand for driving

- Allowing for a larger share of enrollment and administrative tasks to be completed online, or at other Centers
- Staggering availability of certain tasks for certain groups of students, such as orientation

4.4 Additional Factors Affecting Parking Demand

The parking demand analysis presented above represents the latent, unserved demand that would be expected with an overall increase in enrollment. However, many factors other than the provision of TDM programs and enrollment can affect demand for parking.

First, as indicated in Section 2.5, around two-thirds of outreach participants who drive to campus indicated they would change their behavior if parking were harder to find. While stated preference surveys such as this may slightly overestimate the behavioral change due to reduced parking supply, a significant number of individuals may very well shift to other modes of travel, or to drop-off based modes that do not involve a parking instance, if there was less parking on campus.

Second, research on changes in travel behavior due to parking price is limited, and estimates for how changes in permit pricing would change student behavior are simply estimates. A higher parking price, in conjunction with lower parking supply, could potentially lead additional students to change their travel patterns.

Finally, as overall development continues in San Francisco and the larger Bay Area, more students may be located proximate to high quality transit services. These macro-level changes in the Bay Area land use setting could result in overall changes in travel patterns that cannot be foreseen at this time. Similarly, the increase in prevalence of Lyft and Uber, which allow for auto mobility without needing parking, may help shift parking demand away from CCSF facilities. Use of these services in lieu of driving (and parking) a personal vehicle come with tradeoffs, namely additional vehicle trips and demand for curbspace or areas to pick-up and drop-off passengers.

Chapter 5. Conclusions and Next Steps

In general, CCSF's location in a transit-rich environment provides it with an advantage in shifting travel away from vehicles and in managing the related parking demand. However, as a mission-focused institution serving a wide variety of student types, any changes to campus access – including changes to parking and transportation – should be considered carefully in light of concerns regarding equity, mobility, and quality of the student experience.

This study presents several options for TDM strategies, as well as the general finding that absent any other changes, there will be some unmet demand for parking following development of the PAEC and the Balboa Reservoir Housing Project. In order to proactively address this unmet demand, CCSF staff will need to answer a number of core questions.

How will CCSF balance parking demand with sustainability goals and minimizing the impact of vehicle trips? As noted above, the parking demand numbers presented here represent the latent demand for parking, or the number of people wishing to drive to campus and park during the peak hours *all else being equal*. The Core TDM Strategies represent cost-effective means of reducing demand for parking and for driving alone to campus. However, the more effective strategies include higher costs, particularly if CCSF wishes to consider subsidizing transit. Fehr & Peers recommends adopting and implementing the drive alone trip reduction targets provided in the Core TDM Measure list and assessing changes in travel and parking patterns over time as parking availability fluctuates during construction of the PAEC and Balboa Reservoir Housing Project.

Table 16 summarizes the anticipated unmet parking demand for each scenario under the core TDM program, additional TDM program, and if some mode shift is assumed based on the reduction in parking supply. Generally, during typical school operations, there could be an unmet parking demand of between 392 spaces and 980 spaces, depending on the level of investment in TDM, and potential mode shift changes. During the first week of school, when demand for parking is highest, there could potentially be an unmet parking demand of between 700 and 1,800 spaces, although additional TDM measures and scheduling adjustments in the first week of school may help reduce this shortfall. Parking demand at peak periods can be met via temporary solutions such as valet parking.

Table 16: Summary of Unmet Parking Demand by Scenario

Scenario	With Core TDM Programs		With Additional TDM Programs		With Core TDM Programs and Additional Mode Shift with Lower Parking Supply	
	Peak Week	Typical Week	Peak Week	Typical Week	Peak Week	Typical Week
Scenario 1 - PAEC Only	760	0	0	0	304	0
Scenario 2 - Balboa Reservoir Housing Only	1,007	220	242	0	403	88
Scenario 3 - PAEC + Balboa Reservoir Housing	1,767	980	1,002	415	707	392

Is meeting parking demand a financial investment priority for the College? Constructing parking structures is a costly venture, and so this question goes hand-in-hand with the question of whether CCSF can accept some level of unmet parking demand. Feedback from employees indicates that they place a high value on the parking benefits provided to them; conversely, students were more likely to request investment in alternative transportation or in educational facilities rather than in parking.

In considering these questions, Fehr & Peers recommends that CCSF adopt a phased approach to building new parking facilities, with the first phase reflecting unmet parking demand after implementation of Core TDM measures. CCSF should also incorporate a feedback loop for assessing parking demand over time including reviewing the effectiveness of TDM measures and any changes in travel and parking patterns. Based on feedback from those affected, as well as the trade-offs of constructing a parking structure, an informed decision can be made on whether and when to proceed with building additional parking.

Appendix A

City of San Francisco
City College, 50 Phelan Ave.
Parking Supply and Demand Survey
Monday, 5/14/2018

	Faculty / Staff Permit Parking															Other Parking										
	Area C			Area D			Area G		Area H			Area J			Area L	Area E	Phelan - West side		Phelan - East side		Area F			Area I		
Start Time	R	Chancellor	ADA	R	Chancellor	ADA	R	ADA	R	Reserved [1]	ADA	R	M	ADA	R	Maintenance	R	M	R	M	R	Reserved [2]	ADA	R	Reserved [1]	Total
Supply	**79**	**2**	**4**	**64**	**1**	**3**	**24**	**2**	**30**	**5**	**8**	**137**	**1**	**10**	**10**	**10**	**34**	**33**	**30**	**21**	**33**	**6**	**29**	**209**	**15**	**800**
7:00 AM	3	0	0	11	0	0	17	0	5	0	0	2	0	0	1	9	30	0	28	1	14	4	0	33	0	158
8:00	32	0	0	33	0	0	20	1	9	0	2	38	1	2	10	9	34	1	28	3	29	4	4	101	0	361
9:00	59	1	1	64	0	1	24	2	22	1	7	87	1	2	10	8	34	2	28	7	32	5	14	186	6	604
10:00	79	1	4	64	0	1	24	1	27	1	8	118	3	2	10	7	33	8	28	11	32	6	25	199	13	705
11:00	78	1	4	64	0	1	24	0	29	0	6	124	3	3	10	6	34	7	28	14	31	6	21	205	15	714
Noon	78	1	4	64	0	2	24	1	24	5	6	116	3	3	10	8	33	8	28	11	33	5	23	200	15	705
1:00 PM	75	1	2	64	0	3	21	2	25	1	5	108	3	2	10	8	33	6	29	11	33	6	19	191	12	670
2:00	79	1	3	58	0	1	18	2	25	0	5	99	1	1	10	8	34	6	30	7	33	6	21	167	10	625
3:00	72	1	1	58	0	2	19	1	24	0	5	78	0	1	7	9	33	6	29	5	33	5	19	124	11	543
4:00	68	1	1	57	0	1	20	0	23	0	4	46	1	1	10	9	32	5	28	3	29	2	16	86	6	449
5:00	50	1	1	37	0	0	20	0	17	2	4	38	0	0	6	8	31	2	27	5	29	1	9	75	3	366
6:00	41	1	1	17	0	0	22	0	15	0	4	46	1	1	9	9	34	3	30	5	25	3	12	62	2	343
7:00	57	0	0	8	0	0	21	1	18	3	2	64	1	1	6	8	31	4	30	6	30	4	16	62	1	374
8:00	52	0	0	5	0	0	22	2	21	3	1	28	0	1	6	8	27	3	26	5	26	4	12	45	2	299
9:00 PM	20	0	0	2	0	0	18	1	16	4	0	13	0	1	6	8	13	3	26	2	19	4	5	31	1	193

R - Regular spaces

M - Motorcycles spaces

ADA - Handicapped spaces

[1] Children drop off only, Mon. - Fri., 7am - 10am

[2] Police Vehicles only

Area K - No Parking

City of San Francisco
City College, 50 Phelan Ave.
Parking Supply and Demand Survey
Monday, 8/20/2018

	Faculty / Staff Permit Parking																			
	Area C			Area D			Area G		Area H			Area J			Area L	Area P			
Start Time	R	Chancellor	ADA	R	Chancellor	ADA	R	ADA	R	Reserved [1]	ADA	R	M	ADA	R	R	ADA	Bookstore	Car Share
Supply	**79**	**2**	**4**	**64**	**1**	**3**	**24**	**2**	**30**	**5**	**8**	**137**	**1**	**10**	**10**	**128**	**27**	**1**	**1**
7:00 AM	7	0	0	11	0	1	14	0	9	0	0	5	0	0	3	16	2	1	1
8:00	41	1	0	44	0	3	23	0	22	1	4	43	0	2	10	38	3	1	1
9:00	79	1	4	64	0	3	24	2	26	1	6	113	1	4	10	117	13	1	1
10:00	79	1	4	64	0	3	24	2	26	1	8	137	1	4	10	128	18	1	1
11:00	78	1	4	64	0	3	24	1	26	2	8	130	1	6	10	123	17	1	1
Noon	79	1	3	63	0	1	24	2	24	4	6	122	1	5	10	126	18	1	1
1:00 PM	79	1	2	64	0	2	24	1	26	2	7	122	1	7	10	127	25	1	1
2:00	79	1	3	63	0	3	23	1	25	2	7	104	1	6	10	124	20	1	1
3:00	79	1	1	60	0	2	23	1	25	5	8	92	1	5	10	104	14	0	1
4:00	77	1	0	55	0	1	24	1	22	2	6	83	1	4	7	88	6	0	1
5:00	61	1	2	33	0	0	24	1	22	5	3	52	1	4	4	70	10	0	1
6:00	57	1	2	18	0	0	24	2	22	4	6	63	1	5	10	53	15	1	1
7:00	47	0	0	8	0	0	22	2	22	5	5	64	1	2	8	36	12	1	1
8:00	36	0	0	6	0	0	22	1	16	2	3	52	1	1	7	28	6	1	1
9:00 PM	16	0	0	3	0	0	16	1	14	1	1	15	0	0	2	16	3	1	1

R - Regular spaces
M - Motorcycles spaces
ADA - Handicapped spaces
[1] Children drop off only, Mon. - Fri., 7am - 10am
[2] Police Vehicles only
Area K - No Parking

Other Parking																							
Phelan - West side		Phelan - East side		Area B				Area E	Area F			Area I		Area N		Area O					Area M		
R	M	R	M	R	ADA	Loading	Reserved [2]	Maintenance	R	Reserved [2]	ADA	R	Reserved [1]	Students	Faculty	Students	Faculty	ADA	Carpool	Fuel efficient vehicle	R	ADA	Total
34	**33**	**30**	**21**	**26**	**7**	**3**	**3**	**10**	**33**	**6**	**29**	**209**	**15**	**709**	**56**	**181**	**27**	**7**	**9**	**18**	**987**	**20**	**3010**
34	0	26	1	12	0	0	0	9	23	4	1	23	0	127	0	10	0	0	0	0	1	0	341
34	1	25	5	20	1	1	0	9	30	2	9	88	0	378	22	30	0	1	2	2	4	0	901
34	5	27	17	25	4	2	0	8	33	3	21	184	4	704	56	138	9	2	7	6	108	1	1868
34	9	26	21	26	4	1	0	7	33	3	29	209	15	704	56	181	22	2	9	15	381	1	2300
34	11	27	19	26	3	2	0	10	33	4	27	208	14	707	55	166	27	0	9	16	583	1	2482
34	11	26	16	26	5	1	0	10	33	5	26	196	13	703	54	143	25	0	8	11	457	0	2294
31	11	25	12	26	1	1	0	6	32	4	25	209	15	683	53	134	23	0	8	10	326	0	2137
34	8	25	10	26	2	1	1	10	32	5	21	178	10	625	56	109	19	2	6	5	244	0	1903
34	6	22	8	23	3	0	1	10	32	4	19	138	10	559	52	174	17	1	3	6	112	0	1666
30	6	25	5	24	3	0	0	9	30	3	3	125	6	353	41	57	15	2	3	3	82	0	1204
32	5	26	4	14	2	1	0	9	33	4	11	103	4	308	30	41	14	1	0	4	34	0	974
33	5	25	11	26	5	2	0	10	33	3	20	109	5	525	50	45	8	1	2	2	18	0	1223
32	5	23	15	20	5	3	0	10	27	4	23	88	4	481	52	33	5	0	2	1	11	0	1080
25	3	22	12	18	1	3	0	10	25	5	20	64	2	360	42	23	2	0	0	1	5	0	826
9	0	16	1	9	1	0	0	10	14	4	3	26	1	79	14	7	1	0	0	0	3	0	288

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Planning Commission Motion No. 20730

HEARING DATE: MAY 28, 2020

Case No.:	**2018-007883ENV**
Project Title:	**Balboa Reservoir Project**
Zoning:	P (Public) 40-X and 65-X Height District Balboa Park Station Plan Area
Block/Lot:	Assessor's Block 3180/Lot 190
Project Sponsors:	Reservoir Community Partners, LLC Joe Kirchofer, Avalon Bay Communities (415) 284-9082 or Joe_Kirchofer@avalonbay.com Brad Wiblin, Bridge Housing (415) 321-3565 or bwiblin@bridgehousing.com
Staff Contact:	Jeanie Poling (415) 575-9072 or jeanie.poling@sfgov.org

ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED BALBOA RESERVOIR PROJECT. THE SUBSEQUENT EIR EVALUATES TWO DIFFERENT OPTIONS FOR THE SITE'S RESIDENTIAL DENSITY: (1) THE DEVELOPER'S PROPOSED OPTION (1,100 DWELLING UNITS), PROPOSED BY RESERVOIR COMMUNITY PARTNERS LLC; AND (2) THE ADDITIONAL HOUSING OPTION (1,550 DWELLING UNITS), PROPOSED BY THE CITY. OVERALL, THE PROPOSED PROJECT WOULD CONSTRUCT UP TO APPROXIMATELY 1.8 MILLION GROSS SQUARE FEET OF USES, INCLUDING BETWEEN APPROXIMATELY 1.3 AND 1.5 MILLION GROSS SQUARE FEET OF RESIDENTIAL SPACE, APPROXIMATELY 10,000 GROSS SQUARE FEET OF COMMUNITY SPACE, APPROXIMATELY 7,500 GROSS SQUARE FEET OF RETAIL, UP TO 550 RESIDENTIAL PARKING SPACES AND 750 PUBLIC PARKING SPACES IN THE DEVELOPER'S PROPOSED OPTION, AND UP TO 650 RESIDENTIAL PARKING SPACES IN THE ADDITIONAL HOUSING OPTION. THE BUILDINGS WOULD RANGE IN HEIGHT FROM 25 TO 78 FEET IN THE DEVELOPER'S PROPOSED OPTION AND FROM 25 TO 88 FEET IN THE ADDITIONAL HOUSING OPTION.

MOVED, that the San Francisco Planning Commission (hereinafter "Commission") hereby CERTIFIES the final subsequent environmental impact report identified as Case No. 2018-0078838ENV, the "Balboa Reservoir Project" (hereinafter "Project"), based upon the following findings:

1. The City and County of San Francisco, acting through the Planning Department (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 *et seq.*, hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin.

Code Title 14, Section 15000 *et seq*., (hereinafter "CEQA Guidelines"), and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

A. The Department determined that an environmental impact report (hereinafter "EIR") was required and provided public notice of that determination by publication in a newspaper of general circulation on October 10, 2018.

B. The Department held a public scoping meeting on October 30, 2018, in order to solicit public comment on the scope of the Project's environmental review.

C. On August 7, 2019, the Department published the draft subsequent environmental impact report (hereinafter "DSEIR") and provided public notice in a newspaper of general circulation of the availability of the DSEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DSEIR; this notice was mailed to the Department's list of persons requesting such notice.

D. Notices of availability of the DSEIR and of the date and time of the public hearing were posted near the project site on August 7, 2019.

E. On August 7, 2019, copies of the DSEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DSEIR, and to government agencies, the latter both directly and through the State Clearinghouse.

F. A Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on August 7, 2019.

2. The Commission held a duly advertised public hearing on said DSEIR on September 12, 2019, at which opportunity for public comment was given, and public comment was received on the DSEIR. The period for acceptance of written comments ended on September 23, 2019.

3. The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 47-day public review period for the DSEIR, prepared revisions to the text of the DSEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DSEIR. This material was presented in a responses to comments (RTC) document published on April 29, 2020 and distributed to the Commission; other boards, commissions and departments that will carry out or approve the project; and all parties who commented on the DSEIR. The RTC document was also made available to others upon request.

4. A final subsequent environmental impact report (hereinafter "FSEIR") has been prepared by the Department, consisting of the DSEIR, any consultations and comments received during the review process, any additional information that became available, and the RTC document, all as required by law.

5. Project EIR files have been made available for review by the Commission and the public. These files are available for public review at http://ab900balboa.com/, and are part of the record before the Commission.

6. On May 28, 2020, the Commission reviewed and considered the information contained in the FSEIR and hereby does find that the contents of said report and the procedures through which the FSEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.

7. The Planning Commission hereby does find that the FSEIR concerning File No. 2018-007883ENV reflects the independent judgment and analysis of the City and County of San Francisco, is adequate, accurate, and objective, and that the RTC document contains no significant revisions to the DSEIR that would require recirculation of the document pursuant to CEQA Guideline section 15088.5, and hereby does CERTIFY THE COMPLETION of said FSEIR in compliance with CEQA, the CEQA Guidelines and Chapter 31 of the San Francisco Administrative Code.

8. The Commission, in certifying the completion of said FSEIR, hereby does find that the Project described in the FSEIR would have the following significant unavoidable environmental impacts, which cannot be mitigated to a level of insignificance:

   A. **TR-6b:** Operation of the proposed project, including proposed street network changes, would impact existing passenger and freight loading zones along Lee Avenue between Ocean Avenue and the project site, and may create potentially hazardous conditions for people bicycling and may substantially delay public transit.

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

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

   D. **NO-1:** Project construction would cause a substantial temporary or periodic increase in ambient noise levels at noise-sensitive receptors above levels existing without the project.

   E. **C-NO-1:** Cumulative construction of the proposed project, in combination with construction of reasonably foreseeable future projects, could cause a substantial temporary or periodic increase in ambient noise levels.

   F. **AQ-2a:** During construction, the proposed project would generate criteria air pollutants which would violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants.

G. **AQ-4:** Construction and operation of the proposed project would generate toxic air contaminants, including DPM, which could expose sensitive receptors to substantial pollutant concentrations.

H. **C-AQ-1:** The proposed project, in combination with reasonably foreseeable future projects, would contribute to cumulative regional air quality

I. **C-AQ-2:** The proposed project, in combination with reasonably foreseeable future projects, could contribute to cumulative health risk impacts on sensitive receptors.

9. The Commission reviewed and considered the information contained in the FSEIR prior to approving the Project.

I hereby certify that the foregoing Motion was ADOPTED by the Planning Commission at its regular meeting May 28, 2020.

Jonas P. Ionin
Commission Secretary

AYES: Koppel, Moore, Chan, Diamond, Fung, Imperial, Johnson

NOES: None

ABSENT: None

ADOPTED: May 28, 2020

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Planning Commission Motion No. 20731

HEARING DATE: MAY 28, 2020

Case No.:	**2018-007883ENV**
Project Title:	**Balboa Reservoir Project**
Zoning:	P (Public) 40-X and 65-X Height District Balboa Park Station Plan Area
Block/Lot:	Assessor's Block 3180/Lot 190
Project Sponsors:	Reservoir Community Partners, LLC Joe Kirchofer, Avalon Bay Communities (415) 284-9082 or Joe_Kirchofer@avalonbay.com Brad Wiblin, Bridge Housing (415) 321-3565 or bwiblin@bridgehousing.com
Staff Contact:	Seung Yen Hong (415) 575-9026 or seungyen.hong@sfgov.org

ADOPTING FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT ("CEQA") AND THE CEQA GUIDELINES INCLUDING FINDINGS OF FACT, FINDINGS REGARDING SIGNIFICANT AND UNAVOIDABLE IMPACTS, EVALUATION OF MITIGATION MEASURES AND ALTERNATIVES, THE ADOPTION OF A MITIGATION, MONITORING AND REPORTING PROGRAM AND THE ADOPTION OF A STATEMENT OF OVERRIDING CONSIDERATIONS IN CONNECTION WITH APPROVALS FOR THE BALBOA RESERVOIR PROJECT.

PREAMBLE

The Balboa Reservoir project site is a 17.6-acre rectangular parcel and encompasses Assessor's Block 3180/Lot 190. The site is bounded by City College to the east, Archbishop Riordan High School to the north, the Westwood Park neighborhood to the west, and mixed-use multifamily residential development along Ocean Avenue to the south. The site is less than 0.25 mile north of Ocean Avenue, the primary retail corridor in the Ingleside-Westwood Park neighborhood. The project site is within a P (Public) District and located in 40-X and 65-A Height and Bulk Districts. The project site is within the central portion of the Balboa Park Station Plan Area. The City adopted the area plan in 2009, but the City did not rezone the site as part of plan adoption.

The project site is bounded on three sides by sloping western, northern, and eastern edges that surround a sunken paved surface at the center. It is bounded on the southern side by mixed-use development along Ocean Avenue. An approximately 30-foot-tall earthen berm is located at the western edge of the property. The asphalt-paved surface is relatively level with a slope of 0 to 5 percent, sloping gently up from west to east. There is an approximately 18- and 30-foot increase in elevation between the project site bottom and the top of the eastern and northern slopes, respectively. Along the southern boundary of the site is an 80-foot-wide section of the parcel where a high-pressure underground pipeline maintained by the SFPUC is located

(SFPUC right-of-way). The site does not contain any permanent structures and currently contains 1,007 surface vehicular parking spaces. The lot provides overflow vehicular parking for City College students, faculty, and staff. A cargo storage container is located on the west side of the site, at the foot of the berm slope. The parking lot is entirely paved with no vegetation. The western and northern slopes contain scattered trees and shrubs, with paved pathways along the tops of these slopes. Paved walkways, stairs, vegetation, and lighting are located on the eastern slope, providing pedestrian connections between the project site and adjacent City College property containing parking and the College's Multi-Use Building.

The Project is analyzed as the "Developer's Proposed Option" in the Balboa Reservoir Final Subsequent Environmental Impact Report (hereafter, "FSEIR"), except that the height limit of the easternmost 58 feet of Blocks TH1, TH2 and H is 48 feet, as analyzed in the Additional Housing Option in the FSEIR, rather than 35 feet as analyzed in the Developer's Proposed Option. There would be no additional units associated with this change in height limit. The Project would rezone the site and establish development controls for the development of mixed-income housing, open space, community facilities, small retail, parking, streets, and other infrastructure. The project would include amendments to the General Plan and the Planning Code, and would create a new Balboa Reservoir Special Use District ("SUD"). The special use district would establish land use zoning controls and incorporate design standards and guidelines for the site. The Zoning Map would be amended to show changes from the current use district (P [Public]) to the proposed special use district, except for the SFPUC Right-of-Way which would remain in the P district. The existing height limits of 40 to 65 feet would be modified to varying heights up to 78 feet, as measured by the Planning Code. The Project would include new publicly accessible open space, transportation and circulation changes, and new utilities and other infrastructure. Transportation and circulation changes would include the extension of the existing north–south Lee Avenue across the site and a new internal street network. The project would include a roadway network to be accessible for people walking, including people with disabilities, bicycling, and driving.

The Project would include up to 1.64 million gross square feet in new construction on 10 Blocks and provide approximately 1,100 residential units totaling about 1.3 million gross square feet. A total of up to 50 percent of the new units would be designated affordable to low- and moderate-income households and would include up to 150 units restricted to occupancy by educator households. The Project would contain approximately 10,000 gross square feet of childcare and community space, approximately 7,500 gross square feet of retail space, approximately 550 off-street residential parking spaces and up to 450 off-street public parking spaces for use by the public.

The Planning Department determined that a subsequent environmental impact report (hereinafter "SEIR") was required and provided public notice of that determination by publication in a newspaper of general circulation on October 10, 2018.

The Department held a public scoping meeting on October 30, 2018, in order to solicit public comment on the scope of the Project's environmental review.

On August 7, 2019, the Department published the draft subsequent environmental impact report (hereinafter "DSEIR") and provided public notice in a newspaper of general circulation of the availability

of the DSEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DSEIR; this notice was mailed to the Department's list of persons requesting such notice.

Notices of availability of the DSEIR and of the date and time of the public hearing were posted near the project site on August 7, 2019.

On August 7, 2019, copies of the DSEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DSEIR, and to government agencies, the latter both directly and through the State Clearinghouse.

A Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on August 7, 2019.

The Commission held a duly advertised public hearing on said DSEIR on September 12, 2019, at which opportunity for public comment was given, and public comment was received on the DSEIR. The period for acceptance of written comments ended on September 23, 2019.

The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 47-day public review period for the DSEIR, prepared revisions to the text of the DSEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DSEIR. This material was presented in a responses to comments (RTC) document published on April 29, 2020, and distributed to the Commission, other boards, commissions, and departments that will carry out or approve the project, and all parties who commented on the DSEIR. The RTC document was also made available to others upon request.

A FSEIR has been prepared by the Department, consisting of the DSEIR, any consultations and comments received during the review process, any additional information that became available, and the RTC document, all as required by law.

Project SEIR files have been made available for review by the Commission and the public. These files are available for public review at http://ab900balboa.com, and are part of the record before the Commission.

The Commission reviewed and considered the FSEIR for the Project and found the contents of said report and the procedures through which the FSEIR was prepared, publicized, and reviewed complied with the California Environmental Quality Act (Public Resources Code sections 21000 et seq.), the CEQA Guidelines (14 Cal. Code Reg. sections 15000 et seq.), and Chapter 31 of the San Francisco Administrative Code.

The Commission found the FSEIR was adequate, accurate and objective, reflected the independent analysis and judgment of the Department and the Planning Commission, and that the summary of comments and responses contained no significant revisions to the DEIR, and certified the FSEIR for the Project in compliance with CEQA, the CEQA Guidelines and Chapter 31 by its Motion No. 20730.

The Commission, in certifying the completion of said FSEIR, found that the Project described in the FSEIR would have the following significant unavoidable environmental impacts that cannot be mitigated to a level of insignificance:

A. **TR-6b:** Operation of the proposed project, including proposed street network changes, would impact existing passenger and freight loading zones along Lee Avenue between Ocean Avenue and the project site, and may create potentially hazardous conditions for people bicycling and may substantially delay public transit.

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

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

D. **NO-1:** Project construction would cause a substantial temporary or periodic increase in ambient noise levels at noise-sensitive receptors above levels existing without the project.

E. **C-NO-1:** Cumulative construction of the proposed project, in combination with construction of reasonably foreseeable future projects, could cause a substantial temporary or periodic increase in ambient noise levels.

F. **AQ-2a:** During construction, the proposed project would generate criteria air pollutants which would violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants.

G. **AQ-4:** Construction and operation of the proposed project would generate toxic air contaminants, including DPM, which could expose sensitive receptors to substantial pollutant concentrations.

H. **C-AQ-1:** The proposed project, in combination with reasonably foreseeable future projects, would contribute to cumulative regional air quality

I. **C-AQ-2:** The proposed project, in combination with reasonably foreseeable future projects, could contribute to cumulative health risk impacts on sensitive receptors.

The Commission reviewed and considered the information contained in the FSEIR prior to approving the Project.

The Commission Secretary is the Custodian of Records for the Planning Department materials, located in the File for Case No. 2018-007883ENV. Such records are available at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

On May 28, 2020, the Commission conducted a duly noticed public hearing at a regularly scheduled meeting on Case No. 2018-007883ENV to consider the approval of the Project. The Commission has heard and considered the testimony presented to it at the public hearing and has further considered written

materials and oral testimony presented on behalf of the Project, the Planning Department staff, expert consultants and other interested parties.

The Commission has reviewed the entire record of this proceeding, the CEQA Findings, attached to this Motion as Attachment A and incorporated fully by this reference, regarding the rejection of alternatives, mitigation measures, environmental impacts analyzed in the FSEIR and overriding considerations for approving the Project, and the proposed Mitigation Monitoring and Reporting Program ("MMRP") attached as Attachment B and incorporated fully by this reference. These material were made available to the public as part of the records on file with the Commission Secretary.

MOVED, That the Commission finds that the FSEIR addressed the full scope of the Project under consideration and hereby adopts these findings under CEQA, including rejecting alternatives as infeasible and adopting a Statement of Overriding Considerations, as further set forth in Attachment A hereto, and adopts the MMRP attached as Attachment B, based on substantial evidence in the entire record of this proceeding.

I hereby certify that the foregoing Motion was ADOPTED by the Planning Commission at its regular meeting May 28, 2020.

Jonas P. Ionin
Commission Secretary

AYES: Chan, Diamond, Fung, Imperial, Johnson, Koppel, Moore

NOES: None

ABSENT: None

ADOPTED: May 28, 2020

Attachment A

California Environmental Quality Act Findings

PREAMBLE

In determining to approve the Balboa Reservoir project described in Section I below(the "Project"), the San Francisco Planning Commission (the "Commission") makes and adopts the following findings of fact and decisions regarding the Project description and objectives, significant impacts, significant and unavoidable impacts, mitigation measures and alternatives, and a statement of overriding considerations, based on substantial evidence in the whole record of this proceeding and pursuant to the California Environmental Quality Act, California Public Resources Code Sections 21000 et seq. ("CEQA"), particularly Section 21081 and 21081.5, the Guidelines for Implementation of CEQA, 14 California Code of Regulations Sections 15000 et seq. ("CEQA Guidelines"), in particular Sections 15091 through 15093, and Chapter 31 of the San Francisco Administrative Code ("Chapter 31"). The Commission adopts these findings in conjunction with the Approval Actions described in Section I(c), below, as required by CEQA, separate and apart from the Commission's certification of the Project's final subsequent environmental impact report ("FEIR"), which the Commission certified prior to adopting these CEQA findings.

These findings are organized as follows:

Section I provides a description of the proposed Balboa Reservoir Project, the environmental review process for the Project, the City approval actions to be taken, and the location and custodian of the record.

Section II lists the Project's less-than-significant impacts that do not require mitigation.

Section III identifies potentially significant impacts that can be avoided or reduced to less-than-significant levels through mitigation and describes the disposition of the mitigation measures.

Section IV identifies significant project-specific or cumulative impacts that would not be eliminated or reduced to a less-than-significant level and describes any applicable mitigation measures as well as the disposition of the mitigation measures. The FEIR identified mitigation measures to address these impacts, but implementation of the mitigation measures will not reduce the impacts to a less than significant level.

Sections III and IV set forth findings as to the mitigation measures proposed in the FEIR. (The draft subsequent EIR ("DEIR") and the comments and responses document together comprise the FEIR.) Attachment B to the Planning Commission Motion contains the mitigation monitoring and reporting program ("MMRP"), which provides a table setting forth each mitigation measure listed in the FEIR that is required to reduce a significant adverse impact.

Section V identifies the project alternatives that were analyzed in the DEIR and discusses the reasons for their rejection.

Section VI sets forth the Planning Commission's Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093.

The MMRP for the mitigation measures that have been proposed for adoption is attached with these findings as **Attachment B** to this Motion. The MMRP is required by CEQA Section 21081.6 and CEQA Guidelines Section 15091. Attachment B provides a table setting forth each mitigation measure listed in the FEIR that is required to reduce a significant adverse impact. Attachment B also specifies the agency responsible for implementation of each measure and establishes monitoring actions and a monitoring schedule. The full text of the mitigation measures is set forth in Attachment B.

These findings are based upon substantial evidence in the entire record before the Commission. The references set forth in these findings to certain pages or sections of the DEIR or the responses to comments document, with together comprise the FEIR, are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings.

I. PROJECT DESCRIPTION AND PROCEDURAL BACKGROUND

A. Project Description

The project site is a 17.6-acre rectangular parcel and encompasses Assessor's Block 3180/Lot 190. The site is bounded by City College to the east, Archbishop Riordan High School to the north, the Westwood Park neighborhood to the west, and mixed-use multifamily residential development along Ocean Avenue to the south. The site is less than 0.25 mile north of Ocean Avenue, the primary retail corridor in the Ingleside-Westwood Park neighborhood. The project site is within a P (Public) District and located in 40-X and 65-A Height and Bulk Districts. The project site is within the Balboa Park Station Plan Area. The City adopted the area plan in 2009, but the City did not rezone the site as part of plan adoption.

The project site is bounded on three sides by sloping western, northern, and eastern edges that surround a sunken paved surface at the center. It is bounded on the southern side by mixed-use development along Ocean Avenue. An approximately 30-foot-tall earthen berm is located at the western edge of the property. The asphalt-paved surface is relatively level with a slope of 0 to 5 percent, sloping gently up from west to east. There is an approximately 18- and 30-foot increase in elevation between the project site bottom and the top of the eastern and northern slopes, respectively. Along the southern boundary of the site is an 80-foot-wide section of the parcel where a high-pressure underground pipeline maintained by the SFPUC is located (SFPUC right-of-way). The site does not contain any permanent structures and currently contains 1,007 surface vehicular parking spaces. The lot provides overflow vehicular parking for City College students, faculty, and staff. A cargo storage container is located on the west side of the site, at the foot of the berm slope. The parking lot is entirely paved with no vegetation. The western and northern slopes contain scattered trees and shrubs, with paved pathways along the tops of these slopes. Paved walkways, stairs, vegetation, and lighting are located on the eastern slope, providing pedestrian connections between the project site and adjacent City College property containing parking and the college's four-story Multi-Use Building.

The Project would include up to 1.64 million gross square feet in new construction on 10 blocks and would provide approximately 1,100 residential units totaling about 1.3 million gross square feet. A total of up to 50 percent of the new units would be designated affordable to persons earning between 55 and 120 percent of the area median income and would include up to 150 units restricted to occupancy by educator

households with an average income of 100 percent of the area median income. The Project would contain approximately 10,000 gross square feet of childcare and community space, approximately 7,500 gross square feet of retail space, approximately 550 off-street residential parking spaces and up to 450 off-street public parking spaces for use by the public. Maximum heights of new buildings would range between 25 feet and 78 feet. The Project is analyzed as the "Developer's Proposed Option" in the FEIR, except that the height limit of the easternmost 58 feet of Blocks TH1, TH2 and H is 48 feet. The 48-foot height on these blocks is consistent with the analysis for the Additional Housing Option in the FEIR, rather than 35 feet as analyzed in the Developer's Proposed Option in the FEIR. There would be no additional units in the Project associated with this change in height limit. On December 30, 2019, the Project was certified as an eligible project under the Jobs and Economic Improvement Through Environmental Leadership Act of 2011.

The Project would rezone the site and establish development controls for the development of mixed-income housing, open space, community facilities, small retail, parking, streets, and other infrastructure. The project would include amendments to the General Plan and the Planning Code and would create a new Balboa Reservoir Special Use District ("SUD"). The special use district would establish land use zoning controls and incorporate design standards and guidelines for the site. The Zoning Map would be amended to show changes from the current use district (P [Public]) to the proposed special use district, except for the SFPUC right-of-way, which would remain in the P district. The existing height limits of 40 to 65 feet would be modified to varying heights up to 78 feet, as measured by the Planning Code. The Project would include new publicly accessible open space, transportation and circulation changes, and new utilities and other infrastructure. Transportation and circulation changes would include the extension of the existing north–south Lee Avenue across the site and a new internal street network. The project would include a roadway network to be accessible for people walking, including people with disabilities, bicycling, and driving.

B. Project Objectives

The City and County of San Francisco and the SFPUC, as the current owner of the project site, and be BHC Balboa Builders LLC, the project sponsor, seek to fulfill the following shared objectives associated with the Balboa Reservoir project:

- Implement the goals of the City's 2014 Public Land for Housing program and the Surplus Public Lands Initiative (Proposition K), passed by the voters in November 2015, by replacing an underused surface parking lot located on surplus public land with a substantial amount of new housing, including a high percentage of affordable housing.
- Implement the objectives and goals of the General Plan Housing Element and of the 2009 Balboa Park Station Area Plan that calls for the development of a mixed-use residential neighborhood on the west reservoir to address the citywide demand for housing.
- Contribute to the City's goal of creating 5,000 housing units each year on a site specifically identified in the General Plan for additional housing in close proximity to local and regional public transportation by maximizing the number of housing units in the project.
- Build a high-quality residential community with a wide range of building types and heights, and a range of dwelling unit type and tenure, which will provide new residents with the greatest variety of housing options.

- Build a mixed-income community with a high percentage of affordable units to provide housing options for households at a range of income levels, and by doing so facilitate a neighborhood that fosters personal connections across income ranges.
- Replace the reservoir's abandoned infrastructure with new infrastructure improvements, including new streets and sidewalks, bicycle and pedestrian amenities, pedestrian paseos and multiuse paths, water, sewer and gas/electric utilities, new fire hydrant infrastructure and an extension of the City's Auxiliary Water Supply System (AWSS), and community facilities including one new public park, another major open space, a community center, and a childcare facility.
- Establish pedestrian and bicycle connections from the project site to adjacent neighborhoods including City College of San Francisco, Ocean Avenue, Sunnyside and Westwood Park, and increase and improve pedestrian access to transit connections in the area including Bay Area Rapid Transit (BART), Municipal Railway (Muni) light-rail and bus lines, and Muni's City College Terminal.
- As stated in the City's Balboa Reservoir Request for Proposals, work with City College to address parking needs by identifying substitute parking and transportation solutions.
- Develop a project that is financially feasible and able to support the financial investment that will be required to realize it, including equity and debt return levels that will be required by investors and lenders to finance residential developments, as well as eligibility for required federal, state, regional, and local sources of subsidy for infrastructure and utility construction and affordable housing.

The City and SFPUC have the following additional objective:

- Provide SFPUC's water utility ratepayers with fair market value for this utility land asset as required by the city's charter and applicable law.

C. Project Approvals

The Project requires the following public agency approvals:

California Regional Water Quality Control Board – San Francisco Bay Region

- Approval of Section 401 water quality certification
- Approval of General Construction Stormwater Permit

Bay Area Air Quality Management District

- Approval of any necessary air quality permits (e.g., Authority to Construct and Permit to Operate) for individual air pollution sources, such as emergency diesel generators

San Francisco Community College District

- Act as responsible agency under CEQA
- Approval of an amended easement and access agreement

San Francisco Board of Supervisors

- Adoption of CEQA findings

- Approval of General Plan amendments
- Approval of Planning Code amendments (SUD) and associated zoning map and height map amendments
- Approval of a development agreement
- Approval of dedications and easements for public improvements, and acceptance of public improvements, as necessary
- Approval of an amended easement and access agreement with the San Francisco Community College District for roadway access and any joint development of streets, if applicable
- Approval of a resolution(s) authorizing the sale of property under SFPUC jurisdiction and various license agreements for use, construction, and open space on SFPUC property

San Francisco Planning Commission

- Certification of the FEIR
- Adoption of CEQA findings
- Initiation and recommendation to the San Francisco Board of Supervisors to approve amendments to the General Plan
- Recommendation to the San Francisco Board of Supervisors to approve Planning Code amendments adopting an SUD and associated zoning map amendments
- Approval of Design Standards and Guidelines
- Approval of the Project as part of the development agreement and recommendation to the San Francisco Board of Supervisors to approve a development agreement

San Francisco Public Utilities Commission or General Manager

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

San Francisco Department of Public Works

- Actions and approvals related to its jurisdictional authority

San Francisco Municipal Transportation Agency

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

San Francisco Fire Department

- Actions and approvals related to its jurisdictional authority

San Francisco Department of Building Inspection

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

San Francisco Department of Public Health

- Actions and approvals related to its jurisdictional authority

D. Environmental Review

The project sponsor filed an environmental evaluation application with the Planning Department on May 31, 2018. This filing initiated the environmental review process. The EIR process includes an opportunity for the public to review and comment on the Project's potential environmental effects and to further inform the environmental analysis.

On October 10, 2018, the Planning Department issued the notice of preparation (NOP) of an EIR on the proposed Balboa Reservoir project and made the NOP available on its website. The NOP was sent to governmental agencies, organizations, and persons interested in the Project, and publication of the NOP initiated the 30-day public scoping period for this DEIR, which started on October 10, 2018, and ended on November 12, 2018. The NOP included a description of the Project and a request for agencies and the public to submit comments on the scope of environmental issues.

The Planning Department held a public scoping meeting on Tuesday, October 30, 2018, at the Lick Wilmerding High School Cafeteria, 755 Ocean Avenue, San Francisco, to receive oral comments on the scope of the DEIR. During the scoping period, a total of 84 comment letters and emails were submitted to the Planning Department and 16 speakers provided oral comments at the public scoping session. The Planning Department considered all of these comments in preparing the FEIR for the Project.

On August 7, 2019, the Department published a draft environmental impact report (hereinafter "DEIR"), including an initial stud , and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice.

Notices of availability of the DEIR and of the date and time of the public hearing were posted near the Project site by the project sponsor on August 7, 2019.

On August 7, 2019, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies, the latter both directly and through the State Clearinghouse.

A Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on August 7, 2019.

The Commission held a duly advertised public hearing on the DEIR on September 12, 2019, at which opportunity for public comment was given, and public comment was received on the DEIR. The period for commenting on the DEIR ended on September 23, 2019.

The Department prepared responses to comments on environmental issues received during the 47-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected clerical errors in the DEIR. This material was presented in a responses to comments document, published on April 29, 2020, distributed to the Commission and all parties who commented on the DEIR, to any board(s), commission(s) or department(s) that will carry out or approve the project, and made available to others upon request at the Department.

A final environmental impact report (hereinafter "FEIR") has been prepared by the Department, consisting of the DEIR, any consultations and comments received during the review process, any additional information that became available, and the responses to comments document all as required by law. The initial study is included as Appendix B to the DEIR and is incorporated by reference thereto.

Project FEIR files have been made available for review by the Commission and the public. These files are available for public review at http://ab900balboa.com/and are part of the record before the Commission.

On May 28, 2020, the Commission reviewed and considered the FEIR and found that the contents of said report and the procedures through which the FEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code. The FEIR was certified by the Commission on May 28, 2020, by adoption of its Motion No. 20730.

E. Content and Location of Record

The record upon which all findings and determinations related to the adoption of the Project are based include the following:

- The FEIR, and all documents referenced in or relied upon by the FEIR, including the initial study;
- All information (including written evidence and testimony) provided by City staff to the Planning Commission relating to the FEIR, the proposed approvals and entitlements, the Project, and the alternatives set forth in the FEIR;
- All information (including written evidence and testimony) presented to the Planning Commission by the environmental consultant and subconsultants who prepared the FEIR, or incorporated into reports presented to the Planning Commission;
- All information (including written evidence and testimony) presented to the City from other public agencies relating to the project or the FEIR;
- All applications, letters, testimony, and presentations presented to the City by the Project Sponsor and its consultants in connection with the Project;

- All information (including written evidence and testimony) presented at any public hearing or workshop related to the Project and the DEIR;

- The MMRP; and,

- All other documents comprising the record pursuant to Public Resources Code Section 21167.6(e).

The public hearing transcripts and audio files, a copy of all letters regarding the FEIR received during the public review period, the administrative record, and background documentation for the FEIR are available at http://ab900balboa.com/. The Planning Department, Jonas P. Ionin, is the custodian of these documents and materials.

F. Findings about Environmental Impacts and Mitigation Measures

The following Sections II, III, and IV set forth the Commission's findings about the FEIR's determinations regarding significant environmental impacts and the mitigation measures proposed to address them. These findings provide the written analysis and conclusions of the Commission regarding the environmental impacts of the Project and the mitigation measures included as part of the FEIR and adopted by the Commission as part of the Project. To avoid duplication and redundancy, and because the Commission agrees with, and hereby adopts, the conclusions in the FEIR, these findings will not repeat the analysis and conclusions in the FEIR but instead incorporate them by reference and rely upon them as substantial evidence supporting these findings.

In making these findings, the Commission has considered the opinions of staff and experts, other agencies, and members of the public. The Commission finds that (i) the determination of significance is a judgment decision within the discretion of the City and County of San Francisco; (ii) the significance determinations used in the FEIR are supported by substantial evidence in the record, including the expert opinion of the FEIR preparers and City staff; and (iii) the significance determinations used in the FEIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project. Thus, although, as a legal matter, the Commission is not bound by the significance determinations in the FEIR (see Public Resources Code, Section 21082.2, subdivision (e)), the Commission finds them persuasive and hereby adopts them as its own.

These findings do not attempt to describe the full analysis of each environmental impact contained in the FEIR. Instead, a full explanation of these environmental findings and conclusions can be found in the FEIR, and these findings hereby incorporate by reference the discussion and analysis in the FEIR supporting the determination regarding the project impact and mitigation measures designed to address those impacts. In making these findings, the Commission ratifies, adopts and incorporates in these findings the determinations and conclusions of the FEIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings, and relies upon them as substantial evidence supporting these findings.

As set forth below, the Commission adopts and incorporates the mitigation measures set forth in the FEIR, which are set forth in the attached MMRP, to reduce the significant and unavoidable impacts of the Project. The Commission intends to adopt the mitigation measures proposed in the FEIR. Accordingly, in the event a mitigation measure recommended in the FEIR has inadvertently been omitted in these findings or the

MMRP, such mitigation measure is hereby adopted and incorporated in the findings below by reference. In addition, in the event the language describing a mitigation measure set forth in these findings or the MMRP fails to accurately reflect the mitigation measures in the FEIR due to a clerical error, the language of the policies and implementation measures as set forth in the FEIR shall control. The impact numbers and mitigation measure numbers used in these findings reflect the information contained in the FEIR.

In Sections II, III and IV below, the same findings are made for a category of environmental impacts and mitigation measures. Rather than repeat the identical finding to address each and every significant effect and mitigation measure, the initial finding obviates the need for such repetition because in no instance is the Commission rejecting the conclusions of the FEIR or the mitigation measures recommended in the FEIR for the Project.

These findings are based upon substantial evidence in the entire record before the Planning Commission. The references set forth in these findings to certain pages or sections of the DEIR or responses to comments in the FFEIR are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings.

II. LESS-THAN-SIGNIFICANT IMPACTS

The FEIR finds that implementation of the Project would result in less-than-significant impacts in the following environmental topic areas: Land Use and Land Use Planning, Population and Housing, Greenhouse Gas Emissions, Wind, Shadow, Recreation, Utilities and Services Systems, Public Services, Biological Resources, Hydrology and Water Quality, Hazards and Hazardous Materials, Energy, Mineral Resources, Agriculture and Forestry Resources, and Wildfire.

III. FINDINGS OF SIGNIFICANT IMPACTS THAT CAN BE AVOIDED OR REDUCED TO A LESS-THAN-SIGNIFICANT LEVEL THROUGH MITIGATION AND THE DISPOSITION OF THE MITIGATION MEASURES

CEQA requires agencies to adopt mitigation measures that would avoid or substantially lessen a project's identified significant impacts or potential significant impacts if such measures are feasible. The findings in this section concern eight impacts and nine mitigation measures identified in the FEIR. These mitigation measures are in the MMRP, which is included as Attachment B to the Planning Commission Motion adopting these findings.

The project sponsor has agreed to implement the following mitigation measures to address the potential noise, air quality, cultural resources, tribal cultural resources, and geology and soils identified in the FEIR. As authorized by CEQA Section 21081 and CEQA Guidelines Section 15091, 15092, and 15093, based on substantial evidence in the whole record of this proceeding, the Planning Commission finds that, unless otherwise stated, the Project will be required to incorporate mitigation measures identified in the FEIR into the Project to mitigate or to avoid significant or potentially significant environmental impacts. Except as otherwise noted, these mitigation measures will reduce or avoid the potentially significant impacts described in the FEIR, and the Commission finds that these mitigation measures are feasible to implement and are within the responsibility and jurisdiction of the City and County of San Francisco to implement or enforce.

Additionally, the required mitigation measures are included as conditions of project approval and will be enforced through conditions of approval in any building permits issued for the Project by the San Francisco Department of Building Inspection. With the required mitigation measures, these impacts would be avoided or reduced to a less-than-significant level:

Noise Impacts

Impact NO-3: Operation of the fixed mechanical equipment on the project site could result in a substantial permanent increase in ambient noise levels in the immediate project vicinity, and permanently expose noise-sensitive receptors to noise levels in excess of standards in the San Francisco Noise Ordinance**.** However, implementation of the following mitigation measure would reduce operational noise impacts to less than significant for the reasons cited on DEIR pages 3,C-35 through 3.C-36. :

M-NO-3: Fixed Mechanical Equipment Noise Controls

Impact C-NO-3: Cumulative mechanical equipment noise of the proposed project, in combination with reasonably foreseeable future projects, could cause a substantial permanent increase in ambient noise levels in the project vicinity; however, the proposed project would not contribute considerably with implementation of the following mitigation measure for the reasons cited on DEIR pages 3,C-41 through 3.C-42:

M-NO-3: Fixed Mechanical Equipment Noise Controls

Impacts to Air Quality

Impact AQ-2b: During construction phases that overlap with project operations, the proposed project would generate criteria air pollutants which would violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. However, this impact would be reduced to less than significant with the following mitigation measures for the reasons cited on DEIR pages 3.D-61 through 3.D-62:

M-AQ-2a: Construction Emissions Minimization
M-AQ-2b: Low-VOC Architectural Coatings

Impact AQ-5: The Project could conflict with implementation of the Bay Area 2017 Clean Air Plan; however, this impact would be reduced to a less-than-significant level with the following mitigation measures for the reasons cited on DEIR page 3.D-86:

M-AQ-2a: Construction Emissions Minimization
M-AQ-2b: Low-VOC Architectural Coatings
M-AQ-4a: Diesel Backup Generator Specifications
M-AQ-4b: Install MERV 13 Filters at the Daycare Facility

Impacts to Cultural Resources

Impact CR-2: The Project could cause a substantial adverse change in the significance of an archeological resource pursuant to CEQA Guidelines Section 15064.5(f); however, for the reasons cited on DEIR page B-29,. this impact would be reduced to a less-than-significant level with the following mitigation measure:

M-CR-2: Accidental Discovery of Archeological Resources

Impact CR-3: The Project may disturb human remains, including those interred outside of formal cemeteries. However, for the reasons cited on DEIR page B-30, this impact would be reduced to less than significant with the following mitigation measure:

M-CR-3: Accidental Discovery of Human Remains and of Associated or Unassociated Funerary Objects

Tribal Cultural Resource Impacts

Impact TC-1: The Project may result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074. However, for the reasons stated on DEIR page B-34, this impact would be reduced to less than significant with the following mitigation measure:

M-TC-1: Tribal Cultural Resources Interpretive Program

Impacts to Geology and Soils

Impact GE-6: The Project could directly or indirectly destroy a unique paleontological resource or site However, for the reasons stated on DEIR page B-105, this impact would be reduced to less than significant with the following mitigation measure:

M-GE-6: Inadvertent Discovery of Paleontological Resources

IV. SIGNIFICANT IMPACTS THAT CANNOT BE AVOIDED OR REDUCED TO A LESS-THAN-SIGNIFICANT LEVEL

Based on substantial evidence in the whole record of these proceedings, the Planning Commission finds that there are nine significant project-specific and cumulative impacts that would not be eliminated or reduced to an insignificant level by the mitigation measures listed in the MMRP. The FEIR identified three significant and unavoidable impacts on transportation and circulation, two significant and unavoidable impacts on noise, and four significant and unavoidable impacts on air quality.

The Planning Commission further finds based on the analysis contained within the FEIR, other considerations in the record, and the significance criteria identified in the FEIR, that feasible mitigation measures are not available to reduce the significant Project impacts to less-than-significant levels, and thus those impacts remain significant and unavoidable. The Commission also finds that, although measures were considered in the FEIR that could reduce some significant impacts, certain measures, as described in this Section IV below, are infeasible for reasons set forth below, and therefore those impacts remain significant and unavoidable or potentially significant and unavoidable.

Thus, the following significant impacts on the environment, as reflected in the FEIR, are unavoidable. But, as more fully explained in Section VI, below, under Public Resources Code Section 21081(a)(3) and (b), and CEQA Guidelines 15091(a)(3), 15092(b)(2)(B), and 15093, the Planning Commission finds that these impacts are acceptable for the legal, environmental, economic, social, technological and other benefits of the Project. This finding is supported by substantial evidence in the record of this proceeding.

The FEIR identifies the following impacts for which no feasible mitigation measures were identified that would reduce these impacts to a less than significant level:

Impacts to Transportation and Circulation

Impact TR-6b: Operation of the Project, including proposed street network changes, would impact existing passenger and freight loading zones along Lee Avenue between Ocean Avenue and the Project site, and may create potentially hazardous conditions for people bicycling and may substantially delay public transit. No feasible mitigation measures were identified that would reduce this impact to a less than significant after consideration of several potential mitigation measures. The Commission finds that, for the reasons set forth in the FEIR, this impact would remain significant and unavoidable.

Impact C-TR-4: The Project, in combination with reasonably foreseeable future projects, may result in a potentially significant cumulative impact related to public transit delay and the project could contribute considerably. No feasible mitigation measures were identified that would reduce this impact to a less than significant level after the City considered several potential mitigation measures. The project sponsor has agreed to implement the following mitigation measure:

- *Mitigation Measure M-C-TR-4: Implement Measures to Reduce Transit Delay*

Implementation of these measures would reduce transit delay for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic. However, given the uncertainty of SFMTA approval of these measures, and because SFMTA cannot commit funding to these capital improvements, the impact of the proposed project options would remain significant and unavoidable with mitigation, even with implementation of Mitigation Measure M-C-TR-4**.**

Impact C-TR-6b: Operation of the Project, including proposed street network changes, in combination with reasonably foreseeable future projects, would impact existing passenger and freight loading zones along Lee Avenue between Ocean Avenue and the project site, and may create potentially hazardous conditions for people bicycling and may substantially delay public transit. No feasible mitigation measures were identified that would reduce this impact to a less than significant after the City considered several potential mitigation measures. The Commission finds that, for the reasons set forth on pages 3.b-100 through 3.B-101 of the FEIR, this impact would remain significant and unavoidable.

Impacts to Noise

Impact NO-1: Project construction would cause a substantial temporary or periodic increase in ambient noise levels at noise-sensitive receptors above levels existing without the project. No feasible mitigation measures were identified that would reduce this impact to a less-than-significant level after consideration of several potential mitigation measures. The project sponsor has agreed to implement the following mitigation measure; ; however, as cited on page 3.C-40 of the DEIR, the mitigation measure would reduce the impact but not to a less-than-significant level:

- *Mitigation Measure M-NO-1: Construction Noise Control Measures*

Impact C-NO-1: Cumulative construction of the Project, in combination with construction of reasonably foreseeable future projects, could cause a substantial temporary or periodic increase in ambient noise levels. No feasible mitigation measures were identified that would reduce this impact to a less-than-significant level after consideration of several potential mitigation measures. The project sponsor has agreed to implement the following mitigation measure; however, as cited on page 3.C-31 of the DEIR, the mitigation measure would reduce the impact but not to a less-than-significant level:

- *Mitigation Measure M-NO-1: Construction Noise Control Measures*

FEIR Impact to Air Quality

Impact AQ-2a: During construction, the Project would generate criteria air pollutants that would violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants). No feasible mitigation measures were identified that would reduce this impact to a less than significant level after consideration of several potential mitigation measures. The project sponsor has agreed to implement the following mitigation measures that, for the reasons stated on DEIR page 3.D-54, would reduce impacts but not to a less-than-significant level:

- *Mitigation Measure M-AQ-2a: Construction Emissions Minimization*
- *Mitigation Measure M-AQ-2b: Low-VOC Architectural Coatings*
- *Mitigation Measure M-AQ-2c: On-Road Truck Emissions Minimization for the Compressed Construction Schedule*
- *Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule*

Impact AQ-4: Construction and operation of the Project would generate toxic air contaminants, including DPM, which could expose sensitive receptors to substantial pollutant concentrations. No feasible mitigation measures were identified that would reduce this impact to a less -than -significant level after consideration of several potential mitigation measures. The project sponsor has agreed to implement the following mitigation measures; however, for the reasons stated on DEIR pages 3.D-71 through 3.D-78, these mitigation measures would reduce impacts but not to a less-than-significant level:

- *Mitigation Measure M-AQ-2a: Construction Emissions Minimization*
- *Mitigation Measure M-AQ-4a: Diesel Backup Generator Specifications*
- *Mitigation Measure M-AQ-4b: Install MERV 23 Filters at the Daycare Facility*

Impact C-AQ-1: The Project, in combination with reasonably foreseeable future projects, would contribute to cumulative regional air quality impacts. No feasible mitigation measures were identified that would reduce this impact to a less-than-significant level after consideration of several potential mitigation measures. The project sponsor has agreed to implement the following mitigation measures; however, for the reasons cited on DEIR page 3.D-90, these mitigation measures would not reduce the impact to a less-than-significant level:

- *Mitigation Measure M-AQ-2a: Construction Emissions Minimization*
- *Mitigation Measure M-AQ-2b: Low-VOC Architectural Coatings*
- *Mitigation Measure M-AQ-2c: On-Road Truck Emissions Minimization for the Compressed Construction Schedule*
- *Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule*
- *Mitigation Measure M-AQ-4a: Diesel Backup Generator Specifications*

Impact C-AQ-2: The Project, in combination with reasonably foreseeable future projects, could contribute to cumulative health risk impacts on sensitive receptors. No feasible mitigation measures were identified that would reduce this impact to a less-than-significant level after consideration of several potential mitigation measures. The project sponsor has agreed to implement the following mitigation

measures; however, for the reasons cited on DEIR pages 3.d-91 through 3.D-92, these mitigation measures would reduce impacts but not to a less-than-significant level:

- *Mitigation Measure M-AQ-2a: Construction Emissions Minimization*
- *Mitigation Measure M-AQ-4a: Diesel Backup Generator Specifications*
- *Mitigation Measure M-AQ-4b: Install MERV 13 Filters at the Daycare Facility*

V. EVALUATION OF PROJECT ALTERNATIVES

A. Alternatives Analyzed in the FEIR

This section describes the alternatives analyzed in the Project FEIR and the reasons for rejecting the alternatives as infeasible. CEQA mandates that an EIR evaluate a reasonable range of alternatives to the project or the project location that generally reduce or avoid potentially significant impacts of the Project. CEQA requires that every EIR also evaluate a "No Project" alternative. Alternatives provide a basis of comparison to the Project in terms of their significant impacts and their ability to meet project objectives. This comparative analysis is used to consider reasonable, potentially feasible options for minimizing environmental consequences of the Project.

The Planning Department considered a range of alternatives in Chapter 6 of the FEIR. The FEIR analyzed the No Project Alternative, the Reduced Density Alternative, the San Ramon Way Passenger Vehicle Access Alternative, and the Six-Year Construction Schedule Alternative. Each alternative is discussed and analyzed in these findings, in addition to being analyzed in the FEIR, including Chapter 6. The Planning Commission certifies that it has independently reviewed and considered the information on the alternatives provided in the FEIR and in the record. The FEIR reflects the Planning Commission's and the City's independent judgment as to the alternatives. The Planning Commission finds that the Project provides the best balance between satisfaction of project objectives and mitigation of environmental impacts to the extent feasible, as described and analyzed in the FEIR.

B. Reasons for Approving the Project

- To implement the goals of the City's 2014 Public Land for Housing program and the Surplus Public Lands Initiative (Proposition K), passed by the voters in November 2015, by replacing an underused surface parking lot located on surplus public land with a substantial amount of new housing, including a high percentage of affordable housing.
- To implement the objectives and goals of the General Plan Housing Element and of the 2009 Balboa Park Station Area Plan that calls for the development of a mixed-use residential neighborhood on the west reservoir to address the citywide demand for housing.
- To contribute to the City's goal of creating 5,000 housing units each year on a site specifically identified in the General Plan for additional housing in close proximity to local and regional public transportation by maximizing the number of housing units in the project.
- To build a high-quality residential community with a wide range of building types and heights, and a range of dwelling unit type and tenure, which will provide new residents with the greatest variety of housing options.
- To build a mixed-income community with a high percentage of affordable units to provide housing options for households at a range of income levels, and by doing so facilitate a neighborhood that fosters personal connections across income ranges.

- To replace the reservoir's abandoned infrastructure with new infrastructure improvements, including new streets and sidewalks, bicycle and pedestrian amenities, pedestrian paseos and multiuse paths, water, sewer and gas/electric utilities, new fire hydrant infrastructure and an extension of the City's Auxiliary Water Supply System (AWSS), and community facilities including one new public park, another major open space, a community center, and a childcare facility.
- To establish pedestrian and bicycle connections from the project site to adjacent neighborhoods including City College of San Francisco, Ocean Avenue, Sunnyside and Westwood Park, and increase and improve pedestrian access to transit connections in the area including Bay Area Rapid Transit (BART), Municipal Railway (Muni) light-rail and bus lines, and Muni's City College Terminal.[1]
- As stated in the City's Balboa Reservoir Request for Proposals, to work with City College to address parking needs by identifying substitute parking and transportation solutions.
- To develop a project that is financially feasible and able to support the financial investment that will be required to realize it, including equity and debt return levels that will be required by investors and lenders to finance residential developments, as well as eligibility for required federal, state, regional, and local sources of subsidy for infrastructure and utility construction and affordable housing.
- To provide SFPUC's water utility ratepayers with fair market value for this utility land asset as required by the city's charter and applicable law.

C. Evaluation of Project Alternatives

CEQA provides that alternatives analyzed in an EIR may be rejected if "specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible . . . the project alternatives identified in the EIR." (CEQA Guidelines § 15091(a)(3).) The Commission has reviewed each of the alternatives to the Project as described in the FEIR that would reduce or avoid the impacts of the Project and finds that there is substantial evidence of specific economic, legal, social, technological and other considerations that make these Alternatives infeasible, for the reasons set forth below.

In making these determinations, the Planning Commission is aware that CEQA defines "feasibility" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." The Commission is also aware that under CEQA case law the concept of "feasibility" encompasses (i) the question of whether a particular alternative promotes the underlying goals and objectives of a project, and (ii) the question of whether an alternative is "desirable" from a policy standpoint to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

Five additional alternatives were considered as part of the FEIR's overall alternatives analysis but were rejected from detailed analysis for the following reasons:

Alternative Location. CEQA Guidelines section 15126.6(f)(2) states that alternative locations should be considered if they would avoid or substantially lessen any of the significant effects of a project. While an alternative location might lessen or avoid the operational impacts associated with transportation and

circulation and construction impacts associated with noise and air quality, it was rejected from further consideration because the project objectives are specific to the Balboa Reservoir site, based on policy considerations evaluated by the city. Construction noise and air quality impacts would occur regardless of the site of the project, and no alternative location would eliminate these effects. These impacts are associated with any project that involves demolition, grading, excavation, and/or building construction activities. For this reason, an alternative location for the same number of dwelling units would likely result in the same potential noise and air quality impacts and require the same mitigation measures if demolition, grading, and excavation were required, and because the same number of units would be built. Moreover, no feasible alternative locations within the Balboa Park Station Area Plan area exist for an equivalent or similar level of housing development, including affordable housing. No comparable parcel of land is available within the plan area that the project sponsor could reasonably acquire, control, or otherwise have access. An alternative location, if one were available, would not be consistent with the project objectives related to developing the reservoir site with a mixed-use residential neighborhood, including a substantial number of affordable housing units, site infrastructure, and bicycle and pedestrian connections. Furthermore, an alternative location would not meet the project objective related to developing an underutilized site under the Public Land for Housing program.

One site identified under the Public Land for Housing in the plan area was the 2-acre site at 2340 San Jose Avenue, known as the Upper Yard. A developer for the Upper Yard was selected in 2016 and a building permit was issued in 2018 for the construction of 131 residential units; thus, the Upper Yard location, which is an order of magnitude smaller than the Project, is not available to the project sponsor for development. For these reasons, an alternative location was rejected from further consideration.

Higher Density Alternative. Variations of a higher density alternative (greater than 1,550 units) were raised during the scoping process for this DEIR. A higher density alternative could meet all project objectives; however, this alternative would not address any of the significant and unavoidable environmental impacts. Therefore, this alternative was rejected from further consideration.

Lee Avenue Exit Only Alternative. This alternative would allow southbound egress from the project site onto Ocean Avenue via Lee Avenue and prohibit northbound ingress to the site from Ocean Avenue via Lee Avenue. Two-way operations of Lee Avenue between Ocean Avenue and the project site would be maintained only for delivery vehicles that require access to the Whole Foods off-street loading dock. This alternative would reduce the number of project-generated vehicles on Ocean Avenue, thereby reducing transit delay along the corridor; however, it would limit access to the project site and add vehicle traffic to Frida Kahlo Way and, potentially, to San Ramon Way, if the San Ramon Way Passenger Vehicle Access Alternative were selected. The westbound right-turn lane at Ocean Avenue/Frida Kahlo Way/Geneva Avenue and the northbound left-turn lane at Frida Kahlo Way/North Access Road currently operate near or over capacity during the peak hours, and the additional vehicle traffic under this alternative could cause spillover into the through lanes, which would cause delays to transit on Ocean Avenue and Frida Kahlo Way.

The alternative would not reduce conflicts between people bicycling southbound on Lee Avenue and loading vehicles accessing the loading dock or conducting curbside loading on Lee Avenue. Additionally, people unfamiliar with the site access and circulation may attempt to enter the site from northbound Lee Avenue and would either: (1) complete a U-turn maneuver and continue to the Frida Kahlo Way/North Access Road

entrance or (2) ignore the one-way operations and continue north to enter the site. These actions would result in potentially hazardous conditions and conflicts between vehicles making a U-turn and vehicles exiting the Whole Foods driveway or accessing the loading dock and between vehicles continuing north on Lee Avenue and oncoming southbound traffic.

For these reasons, southbound exit-only operations on Lee Avenue was rejected from further consideration.

Open Space Only Alternative. This alternative would develop the project site with only open space uses, and no residential uses. The Open Space Only Alternative was rejected from further consideration because it would not meet any of the key project objectives related to providing housing to address citywide demand for housing and building a mixed-income community including affordable units.

Fully Affordable Housing Alternative. FEIR A Fully Affordable Housing Alternative would include 100 percent affordable housing at the project site. A 100 percent affordable housing alternative would not meet the project objective to build "a mixed-income community with a high percentage of affordable units to provide housing options for households at a range of income levels." This alternative also would potentially fail to meet, or at least fully meet, the following project objective:

- Develop a project that is financially feasible and able to support the financial investment that will be required to realize it, including equity and debt return levels that will be required by investors and lenders to finance residential developments, as well as eligibility for required federal, state, regional, and local sources of subsidy for infrastructure and utility construction and affordable housing.

- Provide SFPUC's water utility ratepayers with fair market value for this utility land asset as required by the city's charter and applicable law.

This alternative would be a fundamentally different project given the request for qualifications process that occurred for the project site. As noted on DEIR, 100 percent affordable housing developments in San Francisco are typically sponsored by the Mayor's Office of Housing and Community Development, which provides substantial financial support for such projects and which typically seeks out not-for-profit developers who specialize in the production of fully affordable residential projects. Accordingly, it has never been the case that the planning for this project assumed or required a 100 percent affordable housing development, which would require a substantially different financial structure and City development partner(s).

Finally, this alternative would not eliminate or substantially lessen the project's significant, unavoidable impacts because it would contain the same amount of development as the Project. For these reasons, fully affordable housing alternative was rejected from further consideration.

The following alternatives and option were fully considered and compared in the FEIR:

1. <u>No Project Alternative (Alternative A)</u>

Under Alternative A, the Balboa Reservoir site would not be developed with the Project. Under Alternative A, there would be no change to the existing site circulation. The surface parking lot would not be altered, and the existing 1,007 surface vehicular parking spaces would remain. The project site would be

accessed from the North Access Road as under existing conditions. In addition, the Lee Avenue extension, new infrastructure, and streetscape and open space improvements would not be constructed.

The existing development controls on the project site would continue to govern site development and would not be changed. There would be no amendments to the General Plan, Planning Code, or zoning map. No changes related to a new Balboa Reservoir Special Use District or design standards and guidelines would occur. The project site would remain under the existing P (Public) District and the 40-X and 65-A Height and Bulk Districts. Any specific detail about the characteristics of future development under the No Project Alternative would be speculative.

The Planning Commission rejects the No Project Alternative as infeasible because it would fail to meet the project objectives for the following reasons:

1) The No Project Alternative would not meet any of the project objectives;

2) The No Project Alternative would not implement the goals of the City's 2014 Public Land for Housing program and the Surplus Public Lands Initiative by replacing an underused surface parking lot located on surplus public land with a substantial amount of new housing, including a high percentage of affordable housing.

3) The No Project Alternative would not implement the objectives and goals of the General Plan Housing Element and of the 2009 Balboa Park Station Area Plan that calls for the development of a mixed-use residential neighborhood on the west reservoir to address the citywide demand for housing.

4) The No Project Objective would not contribute to the City's goal of creating 5,000 housing units each year on a site specifically identified in the General Plan for additional housing in close proximity to local and regional public transportation by maximizing the number of housing units in the project, would not build a high-quality residential community with a wide range of building types and heights, and a range of dwelling unit type and tenure, with a high percentage of affordable units..

5) The No Project Objective would not replace the reservoir's abandoned infrastructure with new infrastructure improvements and community facilities including one new public park, another major open space, a community center, and a childcare facility, nor establish pedestrian and bicycle connections from the project site to adjacent

For the foregoing reasons, the Planning Commission rejects the No Project Alternative as infeasible.

2. <u>Reduced Density Alternative (Alternative B)</u>

Alternative B would be identical to the Project options with respect to the types of land uses, street configurations, and site plan block configurations. Under Alternative B, the site would be developed with approximately 936,590 gross square feet of residential uses (800 dwelling units). This alternative would include 7,500 gross square feet of retail space and 10,000 gross square feet of childcare and community space. Alternative B would not include a public parking garage. There would be approximately 143,930 gross square feet of parking, providing 400 residential parking spaces. The total building area would be about 66 percent of the Project. Building heights on Blocks A through G would be reduced by one story compared to the project. Blocks TH1, TH2, and H would remain the same as under the Developer's

Proposed Option, with building heights up to 35 feet. The building heights for Blocks A through G for Alternative B would range in height from 25 to 68 feet.

Similar to the Project, this alternative would include approximately 4 acres of open space. The open spaces and parks would be connected by new internal networks such as pedestrian passages, sidewalks, and roadways. The SFPUC would retain ownership of an 80-foot-wide strip of land located along the southern edge of the site where an underground water transmission pipeline is located.

The transportation and circulation improvements under Alternative B would be identical to those under the Project, including the Lee Avenue extension, interior streets, streetscape improvements, bicycle facilities, and Ocean Avenue streetscape modifications.

Operations of the retail, childcare and community facilities space under Alternative B would be the same as that for the Project. The reduction in the number of residential units under Alternative B would also reduce the number of vehicle, pedestrian, and bicycle trips compared to the Project.

Construction of Alternative B would be similar to the Project, though reduced in both magnitude and duration. In general, the same types of construction activities and equipment would be required. It is anticipated that construction would start in 2021 and be completed in 2027. The initial phase (Phase 0) for Alternative B would include demolition of the west side berm and north and east embankments, followed by grading, excavation, and construction of site infrastructure over 12 months from 2021 to 2022. Two phases of vertical construction would follow, each lasting approximately 24 to 30 months. The construction activities during Phases 1 and 2 would include, but not be limited to, finish grading, excavation for subgrade parking, construction of building foundations, building construction, architectural coatings, and paving. Construction of Phase 1 (400 units) would occur from 2022 to 2024. Construction of Phase 2 (400 units) would occur from 2024 to 2027, after Phase 1 is complete. Buildings constructed in Phase 1 would be occupied during construction of Phase 2. Like the Project, the phasing of project implementation would be subject to changes due to market conditions and other unanticipated factors. Therefore, construction could be accelerated and complete as early as 2023 or extend beyond 2027.

The Planning Commission rejects the Reduced Density Alternative as infeasible because it would not eliminate any of the significant unavoidable individual impacts of the Project and it would not meet the project objectives as well as the Project for reasons including, but not limited to, the following:

1) The Reduced Density Alternative would limit the Project to 800 dwelling units; whereas the Project would add 1,100 units to the City's housing stock and maximize the creation of new residential units. The City's important policy objective as expressed in Policy 1.1 of the Housing Element of the General Plan is to increase the housing stock whenever possible to address a shortage of housing in the City.

2) The Reduced Density Alternative would also limit the Project to 400 total affordable units; whereas the Project would add approximately 550 affordable units to the City's stock of affordable housing. The City's important policy objective as expressed in Policy 1.1 of the Housing Element of the General Plan is to increase the affordable housing stock whenever possible to address a shortage of housing in the City.

3) The subsidy required to build each affordable dwelling unit in the Reduced Density Alternative would be higher than for the Proposed Project because the scale of the affordable housing buildings in the Reduced Density Alternative would be less efficient than the affordable housing buildings in the Project.

4) The Reduced Density Alternative would not further the City's housing policies to create more housing, particularly affordable housing opportunities as well as the Project does.

5) The Reduced Density Preservation Alternative would create a project with fewer housing units in an area well-served by transit, services and shopping, which would then push demand for residential development to other sites in the City or the Bay Area. This would result in the Reduced Density Alternative not meeting, to the same degree as the Project, the City's *Strategies to Address Greenhouse Gas Emissions* or the Bay Area Air Quality Management District's ("BAAQMD") requirements for GHG reductions, by not maximizing housing development in an area with abundant local and region-serving transit options.

6) The Reduced Density Alternative would not implement as well as the Project the goals of the City's 2014 Public Land for Housing program and the Surplus Public Lands Initiative by replacing an underused surface parking lot located on surplus public land with a substantial amount of new housing, including a high percentage of affordable housing.

7) The Reduced Density Alternative would not implement as well as the Project the objectives and goals of the General Plan Housing Element and of the 2009 Balboa Park Station Area Plan that calls for the development of a mixed-use residential neighborhood on the west reservoir to address the citywide demand for housing.

8) The Reduced Density Alternative would not contribute as well as the Project to the City's goal of creating 5,000 housing units each year on a site specifically identified in the General Plan for additional housing in close proximity to local and regional public transportation by maximizing the number of housing units in the project.

9) The Reduced Density Alternative is economically infeasible. The Developer retained Economic and Planning Systems, Inc. (EPS), a qualified real estate economics firm, to evaluate the financial feasibility of the Reduced Density Alternative, compared to the Project. In a memorandum dated May 12, 2020, which is included in the record and is incorporated herein by reference, EPS concluded that the Reduced Density Alternative is not financially feasible for the following reasons.

   The project sponsor is evaluating the types of outside funding sources that may be appropriate to help fund the horizontal improvements required to support the Project, including the state's Infill Infrastructure Grant (IIG), a state Park Grant, the California Housing and Community Development's Affordable Housing and Sustainable Communities Program (AHSC), as well as the subsidies required from the City to achieve an affordable housing goal of 50 percent. Eligibility criteria and competitiveness for many of these sources is tied to project density, and the Project Sponsor estimates the Proposed Project is optimizing competitiveness in this regard and at the limit of the potential grant and subsidy amounts that may be awarded.

The reduction in the number of units occurs by reducing the density of each pad (through reduced building heights) rather than by concentrating development on fewer pads. With the reduction in the number of residential units, the number of parking spaces is reduced to 400 spaces that would serve the residential uses only. The remainder of the program, including leasable space for commercial and nonprofit uses and parks and open space remains the same.

The expected land cost is estimated at approximately $11.2 million. SFPUC requires the land payment for the site to reflect fair market value. In this case the fair market value will be determined through an appraisal process; however, it is not expected that SFPUC would accept less than $11.2 million for the land under a reduced development scenario. The site-wide infrastructure costs (e.g., utility infrastructure, roads/curbs/gutters, earthwork and grading, and parks and open space) are estimated at approximately $43.6 million in Phases 0 and 1 and $4.7 million in Phase 2, for a total of $48.3 million (in uninflated 2019 dollars). Unless development is reduced to the point that not all pads are developed, this investment in horizontal infrastructure is relatively fixed. The "per door" infrastructure cost is $45,000 per door for the Proposed Project and $60,000 per door for Reduced Density Alternative, a 33 percent increase. This additional cost burden (on a per door basis) would be in addition to vertical development costs that already cannot be supported by project revenues alone (see next finding).

Since, development fees (including profits) are included as a use of funds, a "Net Surplus/Deficit" of $0 or greater represents a feasible project, while a negative number represents a project deficit and an infeasible project. The Reduced Density Alternative is $26.7 million short of feasibility. This deficit is significantly larger than the $11.2 million land acquisition cost, so, even if the SFPUC were willing to accept a reduced land payment, no amount of reduction in land cost would result in feasibility.

As the development program is reduced, many sources are subject to decreases. Reducing the number of units reduces the amount of outside funding that can be reasonably expected, as it is anticipated that the reduced density project may not compete as well for the grant funding as the Project.

The Office of Economic and Workforce Development engaged Century Urban, a qualified real estate economics firm, to independently review the EPS analysis of the financial feasibility of the Reduced Density Alternatives on behalf of the City. Century Urban produced a memorandum entitled "Financial Feasibility of Balboa Reservoir Project Alternative B," dated May 12, 2020, which is included in the record and is incorporated herein by reference. Century Urban verified that the methodology and assumptions used by EPS were reasonable and verified the conclusion of the EPS analysis that the Reduced Density Alternative is financially infeasible.

10) The Reduced Density Alternative would not avoid or substantially lessen any of the significant and unavoidable impacts of the Project.

For the foregoing reasons, the Planning Commission rejects the Reduced Density Alternative as infeasible.

3. San Ramon Way Passenger Vehicular Access Alternative (Alternative C)

The San Ramon Way Passenger Vehicle Access Alternative would provide access for light vehicles (i.e., passenger cars and vans, but not heavy trucks) to the project site from the west. Alternative C would have the same mix of land uses, site plans, building footprints, building heights, square footages, and construction characteristics as the Project. Vehicle, bicycle, and pedestrian circulation to and from the site from the south and east would not change. However, instead of bicycle and pedestrian-only access at San Ramon Way, Alternative C would also include vehicular (non-truck) access, providing access to and from the west.

San Ramon Way currently terminates just west of the project site; it does not extend all the way to the project site boundary, as the Westwood Park Association (homeowners' association for the Westwood Park neighborhood that is west of the project site) owns an approximately 10-foot-wide parcel between the end of the San Ramon Way and the Project site.

San Ramon Way is approximately 26 feet wide with a 6-foot-wide sidewalk on the north side and a 7- to 10-foot-wide sidewalk on the south side. Parking is currently allowed on both sides of the street. Under Alternative C, the current dimensions of San Ramon Way would be retained and extended through the project site, ending at West Street. Given the San Francisco Fire Department requirement[2] for a 26-foot-wide clear path of travel, the need to accommodate two-way vehicle traffic and increase in vehicle traffic along San Ramon Way associated with Alternative C, six on-street parking spaces each on the north and south sides of San Ramon Way (a total of 12) would be removed under this alternative. San Ramon Way would have a 13-foot-wide single lane of travel in each direction, a 6-foot-wide sidewalk on the north side, and a 7- to 10-foot-wide sidewalk on the south side. San Ramon Way from West Street to Plymouth Avenue would be a shared roadway that would include class III bicycle facilities (sharrows) within the vehicular lanes.

Alternative C would have the same land uses as the Project. Therefore, this alternative would provide 1,100 residential units, 7,500 square feet of commercial space, and 10,000 square feet of community space, along with between off-street parking spaces in buildings up to 78 feet in height.

The Planning Commission rejects the San Ramon Way Passenger Vehicle Access Alternative as infeasible because it would not eliminate any of the significant unavoidable impacts of the Project and for the following reasons:

1) Plymouth Avenue is 24-feet wide. Between Ocean and Greenwood avenues (just north of Archbishop Riordan campus), Plymouth Avenue includes approximately 118 on-street parking spaces along both sides of the street. The FEIR estimated that under this alternative, 31 vehicles (approximately 12 percent of Project-generated vehicle trips) would utilize the San Ramon Way access during the weekday a.m. peak hour and 48 vehicles (15 percent of Project-generated vehicle trips) would utilize the San Ramon Way access during the weekday p.m. peak hour. The FEIR also noted that it's possible that this alternative could encourage some existing drivers to use this new connection to avoid traveling on portions of Ocean Avenue. The addition

of project-generated vehicle traffic and redirected existing traffic to the surrounding streets, including Plymouth Avenue, Southwood Drive, and San Ramon Way west of Plymouth Avenue, would increase instances of oncoming traffic and locations where there is not space for vehicles to pass side-by-side. While Alternative C would not eliminate any of the significant unavoidable impacts of the Project nor cause any significant impacts itself, the additional traffic under this alternative could cause inconvenience to drivers and cyclists using these streets.

2) The Planning Department received a comment letter on the DEIR from the Westwood Park Association concerning this alternative. The association stated they object this alternative and will not sell the 10-foot-wide parcel to make this alternative feasible. The Planning Department received other comment letters also opposing this alternative.

3) The cost of acquiring the 10-foot-wide parcel between the end of San Ramon Street and the Project site from the Westwood Park Association is not part of the Project budget and Development Agreement components. This additional cost burden and the owner of the parcel's opposition to selling it could make the project infeasible in light of the other Project Sponsor commitments under the Development Agreement.

For the foregoing reasons, the Planning Commission rejects the San Ramon Way Passenger Vehicle Access Alternative as infeasible.

4. <u>Six Year Construction Alternative (Alternative D)</u>

The Six Year Construction Alternative would have the same mix of land uses, site plans, circulation, building footprints, building heights, square footages, and construction characteristics as the Project. This alternative would not allow a compressed construction schedule. Therefore, under Alternative D, construction phasing for the Project would be phased under the six-year construction schedule. The initial phase (Phase 0) would include demolition of the parking lot, west side berm, and north and east embankments, followed by grading, excavation, and construction of site infrastructure over 12 months from 2021 to 2022. After Phase 0 is complete, construction of Phase 1 would occur from 2022 to 2024. Construction of Phase 2 would occur from 2024 to 2027, after Phase 1 is complete. Alternative D could be combined with the Project options, variants, and Alternatives B and C. Thus, under Alternative D, there would be no compressed construction schedule scenario and Phases 1 and 2 would not be constructed concurrently.

The Planning Commission rejects the Six Year Construction Alternative as infeasible because it would reduce the project's flexibility to schedule construction phases in less than six years in response to market conditions and the availability of public subsidies for affordable housing and infrastructure improvements.

For the foregoing reason, the Planning Commission rejects the Six Year Construction Alternative as infeasible.

VI. STATEMENT OF OVERRIDING CONSIDERATIONS

The Planning Commission finds that, notwithstanding the imposition of all feasible mitigation measures, impacts related to transportation and circulation, construction noise and construction air quality will remain significant and unavoidable. Pursuant to CEQA section 21081 and CEQA Guideline Section 15093, the Planning Commission hereby finds, after consideration of the FEIR and the evidence in the record, that each of the specific overriding economic, legal, social, technological and other benefits of the Project as set forth below independently and collectively outweighs these significant and unavoidable impacts and is an overriding consideration warranting approval of the Project. Any one of the reasons for approval cited below is sufficient to justify approval of the Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the Commission will stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings regarding the rejection of alternatives, which are incorporated by reference into this Section, and in the documents found in the record, as defined in Section I.

On the basis of the above findings and the substantial evidence in the whole record of this proceeding, the Planning Commission specifically finds that there are significant benefits of the Project to support approval of the Project in spite of the unavoidable significant impacts, and therefore makes this Statement of Overriding Considerations. The Commission further finds that, as part of the process of obtaining Project approvals, significant effects on the environment from implementation of the Project have been eliminated or substantially lessened where feasible. All mitigation measures in the FEIR and MMRP are adopted as part of the Approval Actions described in Section I, above.

The Commission has determined that any remaining significant effects on the environment found to be unavoidable are acceptable due to the following specific overriding economic, technological, legal, social and other considerations.

The Project will have the following benefits:

1. The Project implements the goals of the City's 2014 Public Land for Housing program and the Surplus Public Lands Initiative (Proposition K), passed by the voters in November 2015, by replacing an underused surface parking lot located on surplus public land with 1,100 new dwelling units, including a high percentage of affordable housing

2. The Project contributes to the City's goal of creating 5,000 housing units each year on a site specifically identified in the General Plan for additional housing in close proximity to local and regional public transportation.

3. The Project implements the City's important policy objective as expressed in Policy 1.1 of the Housing Element of the General Plan to increase the housing stock whenever possible to address a shortage of housing in the City.

4. The Project would increase the stock of permanently affordable housing by creating approximately 550 dwelling units affordable to low-income and moderate –income households, including units targeted to educators employed by City College of San Francisco and the San Francisco Unified School District.

5. The subsidy required to build each affordable dwelling unit is low relative to the average subsidy required for other buildings in the Mayor's Office of Housing and Community Development's affordable housing portfolio because the Project's affordable housing buildings are of a scale that provides greater building efficiency than other smaller affordable housing buildings in the City.

6. The Project provides extensive open space, including the 4-acre Reservoir Park and other active and passive open space amenities, all accessible to the public.

7. The Project provides community facilities, including an on-site childcare facility and an on-site community room.

8. The Project replaces the reservoir's abandoned infrastructure with new infrastructure improvements, including new streets and sidewalks, bicycle and pedestrian amenities, pedestrian paseos and multiuse paths, water, sewer and gas/electric utilities, new fire hydrant infrastructure and an extension of the City's Auxiliary Water Supply System (AWSS).

9. The Project establishes pedestrian and bicycle connections from the project site to adjacent neighborhoods including City College of San Francisco, Ocean Avenue, Sunnyside and Westwood Park, and increases and improves pedestrian access to transit connections in the area including Bay Area Rapid Transit (BART), Municipal Railway (Muni) light-rail and bus lines, and Muni's City College Terminal.

10. The Project is consistent with the City's Transit First Policy by limiting off-street residential parking to .5 space per unit, provides ample bicycle parking spaces, and will implement a Transportation Demand Management Program to reduce single-occupy vehicle trips.

11. The Project will assist City College accommodate the parking use of its faculty, staff and students.

12. The Project meets the City's *Strategies to Address Greenhouse Gas Emissions* and the BAAQMD requirements for a GHG reductions by maximizing development on an infill site that is well-served by transit, services and shopping and is suited for dense residential development, where residents can commute and satisfy convenience needs without frequent use of a private automobile, in an area with abundant local and region-serving transit options. The Project would leverage the site's location and proximity to transit by building a dense mixed-use project that allows people to live and work close to transit sources.

13. The Project is consistent with the implements numerous Balboa Park Station Area Plan Objectives and Policies, including the following: Objective 1.4 to develop the Balboa Reservoir in a manner that will best benefit the neighborhood, the city, and the region as a whole; Objective 2.4 to encourage walking, biking, and public transit as the primary means of transportation; Policy 2.4.2 to improve and expand bicycle connections throughout the plan area; Objective 3.1 to establish parking standards and controls that promote quality of place, affordable housing, and transit-oriented development; Policy 3.1.1 to provide flexibility for new residential development by eliminating minimum off-street parking requirements and establishing reasonable parking caps; Policy 3.1.3 to make parking costs visible to users by requiring parking to be rented, leased or sold separately from residential and commercial space for all new major development; Policy 3.2.3 to promote car-sharing programs as an important way to reduce parking needs while still providing

residents with access to an automobile when needed; Objective 4.1 to maximize opportunities for residential infill throughout the plan area; Policy 4.1.2 to eliminate dwelling unit density maximums; Objective 4.3 to establish an active, mixed-use neighborhood around the Balboa Park transit station that emphasizes the development of housing; Objective 4.4 to consider housing as a primary component to any development on the Balboa Reservoir; Policy 4.4.1 to develop housing on the West basin of the reservoir if it is not needed for water storage; Objective 4.5 to provide increased housing opportunities affordable to a mix of households at varying income levels; Policy 4.5.1 to give first consideration to the development of affordable housing on publicly-owned sites; .Objective 5.1 to create a system of public parks, plazas and open spaces in the plan area; Objective 5.2 to create open space within new development that contributes to the open space system; Policy 5.2.1 to require good quality public open space as part of major new developments; Objective 5.3 to promote an urban form and architectural character that supports walking and sustains a diverse, active and safe public realm; Objective 5.4 to create an space system that both beautifies the neighborhood and strengthens the environment; Objective 6.2 to knit together isolated sections of the plan area with new mixed-use infill buildings; Objective 6.4 to respect and build from the successful established patterns and traditions of building massing, articulation, and architectural character of the area and the city; Policy 6.4.1 to create urban design guidelines that ensure that new development contributes to and enhances the best characteristics of the plan area; Policy 6.4.2 that new buildings should epitomize the best in contemporary architecture, but should do so with full awareness of the older buildings that surround them; Policy 6.4.4 that height and bulk controls should maximize opportunities for housing development while ensuring that new development is appropriately scaled for the neighborhood; Objective 6.5 to promote the environmental sustainability, ecological function and the overall quality of the natural environment in the plan area; Policy 6.5.1 that the connection between building form and ecological sustainability should be enhanced by promoting use of renewable energy, energy-efficient building envelopes, passive heating and cooling, and sustainable materials; and Policy 6.5.2 that new buildings should comply with strict environmental efficiency standards.

14. The Project is consistent with and implements numerous objectives and policies of the General Plan, particularly the Housing Element, including the following Housing Element objectives and policies: Objective 1 to identify and make available for development adequate sites to meet the city's housing needs, especially permanently affordable housing; Policy 1.1 to plan for the full range of housing needs in the City and County of San Francisco, especially affordable housing; Policy 1.8 to promote mixed use development, and include housing, particularly permanently affordable housing, in new commercial, institutional or other single use development projects; Policy 1.10 to support new housing projects, especially affordable housing, where households can easily rely on public transportation, walking and bicycling for the majority of daily trips; Objective 12 to balance housing growth with adequate infrastructure that serves the city's growing population; Policy 12.1 to encourage new housing that relies on transit use and environmentally sustainable patterns of movement; Policy 12.2 to consider the proximity of quality of life elements, such as open space, child care, and neighborhood services, when developing new housing units; Policy 12.3 to ensure new housing is sustainably supported by the City's public infrastructure systems; Objective 13 to prioritize sustainable development in planning for and constructing new housing; and Policy 13.3 to promote sustainable land use patterns that integrate housing with transportation in order to increase transit, pedestrian, and bicycle mode share.

15. The MMRP imposes all feasible mitigation measures that would mitigate the Project's potentially significant impacts to less-than-significant levels, except for a limited number of impacts on transportation and circulation, construction noise and construction air quality.

Having considered the above, the Planning Commission finds that the benefits of the Project outweigh the unavoidable adverse environmental effects identified in the FEIR, and that those adverse environmental effects are therefore acceptable.

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MITIGATION MONITORING AND REPORTING PROGRAM FOR BALBOA RESERVOIR PROJECT

Measures Adopted as Conditions of Approval	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Schedule and Verification of Compliance
MITIGATION MEASURES FOR THE BALBOA RESERVOIR PROJECT				
Transportation and Circulation Mitigation Measures				
Mitigation Measure M-C-TR-4: Implement Measures to Reduce Transit Delay. The project sponsor, under either project option, shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic. **Routes and Study Segments.** The following routes and study segments would most likely experience cumulative transit delay impact to which the project would have a considerable cumulative contribution: • K/T Third/Ingleside (outbound): Jules Avenue/Ocean Avenue to Balboa Park Bay Area Rapid Transit (BART) • K/T Third/Ingleside (inbound): San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue • 29 Sunset (outbound): Plymouth Avenue/Ocean Avenue to Mission St/Persia Avenue • 29 Sunset (inbound): Mission St/Persia Avenue to Plymouth Avenue/Ocean Avenue • 43 Masonic (outbound): Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street • 43 Masonic (inbound): Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard **Implement Capital Improvement Measures.** The project sponsor shall contribute funds for the following capital improvement measures that reduce transit travel times: 1. **Signal Timing Modifications at Ocean Avenue/Brighton Avenue**. The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Brighton Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns. 2. **Signal Timing Modifications at Ocean Avenue/Plymouth Avenue.** The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Plymouth Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns. 3. **Bus Boarding Island on Southbound Frida Kahlo Way.** The project sponsor shall fund the design and construction of a bus boarding island on southbound Frida Kahlo Way, north of the Frida Kahlo Way/Geneva Avenue/Ocean Avenue intersection, and restriping, as needed. The cost of these capital improvement measures is $200,000 (in 2020 dollars; cost shall be escalated using consumer price index (CPI) to year of payment), and shall be considered the project's fair share toward mitigating this significant cumulative impact. The fair share contribution, as documented by SFMTA[1], shall not exceed this amount (with CPI escalation) across both payment phases. The project sponsor shall pay $110,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 1, and $90,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 2. If SFMTA adopts a strategy to reduce transit travel times to the K/T Third/Ingleside, 29 Sunset, and 43 Masonic that does not involve signal timing modifications or bus boarding islands, the project's total contribution shall remain the same, and may be used for other transit travel time saving strategies on these routes, as deemed appropriate by the SFMTA. The schedule for implementing capital improvement measures shall be at the discretion of SFMTA, as designated in the SFMTA's capital improvements plan.	Project sponsor	Project sponsor shall submit the $110,000 (plus CPI escalation) payment prior to issuance of the first construction document for the first project building in Phase 1. The project sponsor shall submit the $90,000 (plus CPI escalation) payment prior to issuance of the first construction document for the first project building in Phase 2.	SFMTA	Documentation of compliance. Considered complete when the project sponsor has contributed $200,000 (plus CPI escalation) to fund the SFMTA capital improvement measures.
Noise Mitigation Measures				
Mitigation Measure M-NO-1: Construction Noise Control Measures. The project sponsor shall implement a project-specific noise control plan that has been prepared by a qualified acoustical consultant and approved by the planning department. The noise control plan may include, but not limited to, the following construction noise control measures: • To the extent that it does not extend the overall schedule, conduct demolition of the parking lot at the northern portion of the project site during periods when Archbishop Riordan High School is not in session. • Require the general contractor to ensure that equipment and trucks used for project construction utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds). • Require the general contractor to locate stationary noise sources (such as the rock/concrete crusher, or compressors) as far from adjacent or nearby sensitive receptors as possible, to muffle such noise sources, and/or to construct barriers around such sources	Project sponsor and contractor	Draft noise control plan submittal to Planning Department: prior to issuance of the first demolition or site permit. Draft construction noise monitoring program submittal to Planning Department: prior to start of excavation of all construction phases. Implementation of measures: throughout construction period.	San Francisco Department of Building Inspection (DBI), Planning Department, Department of Public Health (on complaint basis), Police Department (on complaint basis). Planning Department to review and approve noise control plan and construction noise monitoring programs. Project sponsor, qualified consultant, and/or construction contractor(s) to prepare a weekly noise monitoring log which shall be	Considered complete at the completion of construction for each subsequent phase of the project and submittal of final noise monitoring report.

[1] Henderson, Tony, SFMTA, e-mail communication to Elizabeth White, San Francisco Planning Department, and Leigh Lutenski, Office of Economic and Workforce Development on March 30, 2020.

MITIGATION MONITORING AND REPORTING PROGRAM FOR BALBOA RESERVOIR PROJECT

Measures Adopted as Conditions of Approval	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Schedule and Verification of Compliance
and/or the construction site, which could reduce construction noise by as much as 5 dBA. To further reduce noise, the contractor shall locate stationary equipment in pit areas or excavated areas, to the maximum extent practicable. • Require the general contractor to use impact tools (e.g., jackhammers and pavement breakers) that are hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools, which would reduce noise levels by as much as 10 dBA. • Include noise control requirements for construction equipment and tools, including specifically concrete saws, in specifications provided to construction contractors. Such requirements could include, but are not limited to, erecting temporary plywood noise barriers around a construction site, particularly where a site adjoins noise-sensitive uses; utilizing noise control blankets on a building structure as the building is erected to reduce noise levels emanating from the construction site; performing all work in a manner that minimizes noise; and using equipment with effective mufflers. Moveable sound barrier curtains can provide up to 15 dBA of sound attenuation. • Undertake the noisiest activities (e.g., demolition using hoe rams) during the hours of 9 a.m. to 4 p.m.; and select or construct haul routes that avoid the North Access Road and the adjacent Archbishop Riordan High School and residential uses along Plymouth Avenue and Lee Avenue, such as the temporary or permanent relocation of North Street. • Postpone demolition of the west side berm to the end of Phase 0, to the extent that it does not extend the overall schedule, so that it may serve as a noise attenuation barrier for the receptors to the west for earlier Phase 0 demolition and construction activities. • Notify the planning department's development performance coordinator at the time that night noise permits are requested or as soon as possible after emergency/unanticipated activity causing noise with the potential to exceed noise standards has occurred. The general contractor or other designated person(s) shall prepare a weekly noise monitoring log report that shall be made available to the planning department upon request. The log shall include any noise complaints received, whether in connection with an exceedance or not, as well as any noise complaints received through calls to 311 or DBI if the contractor is made aware of them (for example, via a DBI notice, inspection, or investigation). Any weekly report that includes an exceedance or for a period during which a complaint is received shall be submitted to the planning department within three business days following the week in which the exceedance or complaint occurred. A report also shall be submitted to the planning department at the completion of each construction phase. The report shall document noise levels, exceedances of threshold levels, if reported, and corrective action(s) taken.			made available to the Planning Department when requested. Any weekly report that includes an exceedance or for a period during which a complaint is received shall be submitted to the development performance coordinator within 3 business days following the week in which the exceedance or complaint occurred. Project sponsor, qualified consultant, and/or construction contractor(s) to submit final noise monitoring report to the Planning Department development performance coordinator at the completion of each construction phase.	
Mitigation Measure M-NO-3: Fixed Mechanical Equipment Noise Controls. Noise attenuation measures shall be incorporated into all fixed mechanical equipment (including HVAC equipment) installed on all buildings that include such equipment as necessary to meet noise limits specified in Police Code section 2909. Interior noise limits shall be met under both existing and future noise conditions. Noise attenuation measures could include provision of sound enclosures/barriers, addition of roof parapets to block noise, increasing setback distances from sensitive receptors, provision of louvered vent openings, location of vent openings away from adjacent residential uses, and restriction of generator testing to the daytime hours. After completing installation of the HVAC equipment but before receipt of the Certificate of Occupancy for each building, the project sponsor shall conduct noise measurements to ensure that the noise generated by fixed mechanical equipment complies with section 2909(a) and (d) of the San Francisco Noise Ordinance. No Final Certificate of Occupancy shall be issued for any building until the standards in the Noise Ordinance are shown to be met for that building.	Project sponsor	Prior to receipt of any certificate of final occupancy for each building.	San Francisco Department of Building Inspection (DBI). Project sponsor to provide copies of project construction plans to the Planning Department that show incorporation of noise attenuation measures.	Considered complete upon DBI review and issuance of final certificate of occupancy.
Air Quality Mitigation Measures				
Mitigation Measure M-AQ-2a: Construction Emissions Minimization. The project sponsor or the project sponsor's contractor shall comply with the following: A. *Engine Requirements*. 1. All off-road equipment greater than 25 horsepower shall have engines that meet Tier 4 Final off-road emission standards. 2. Since grid power will be available, portable diesel engines shall be prohibited. 3. Renewable diesel shall be used to fuel all diesel engines unless it can be demonstrated to the Environmental Review Officer (ERO) that such fuel is not compatible with on-road or off-road engines and that emissions of ROG and NOx from the transport of fuel to the project site will offset its NOx reduction potential. 4. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The contractor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two-minute idling limit. 5. The contractor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment, and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications. B. *Waivers*. The ERO may waive the equipment requirements of subsection (A)(1) if: a particular piece of off-road equipment is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the	Project sponsor and project sponsor's construction contractor	Submit construction emissions minimization plan to Planning Department prior to issuance of construction site permit. Implement plan throughout construction period. Submit final plan after completion of construction activities and prior to receiving a final certificate of occupancy.	Planning Department (ERO) or their designee must review draft construction emissions minimization plan prior to issuance of first demolition or construction permit and approve final plan prior to the start of demolition or construction. ERO to review quarterly and final monitoring reports.	Considered complete upon Planning Department review and approval of documentation and completion of construction.

MITIGATION MONITORING AND REPORTING PROGRAM FOR BALBOA RESERVOIR PROJECT

Measures Adopted as Conditions of Approval	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Schedule and Verification of Compliance
equipment would create a safety hazard or impaired visibility for the operator; or, there is a compelling emergency need to use other off-road equipment. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, according to the table below. The ERO may waive the equipment requirements of Item A.1 if: a particular piece of off-road equipment with an engine meeting Tier 4 Final emission standards is not regionally available to the satisfaction of the ERO. If seeking a waiver from this requirement, the project sponsor must demonstrate to the satisfaction of the ERO that the health risks from existing sources, project construction and operation, and cumulative sources do not exceed a total of 10 µg/m3 or 100 excess cancer risks for any onsite or offsite receptor. The ERO may waive the equipment requirements of Item A.2 if: an application has been submitted to initiate onsite electrical power, portable diesel engines may be temporarily operated for a period of up to three weeks until onsite electrical power can be initiated or, there is a compelling emergency. C. *Construction Emissions Minimization Plan.* Before starting onsite ground disturbing, demolition, or construction activities, the contractor shall submit a Construction Emissions Minimization Plan to the ERO for review and approval. The plan shall state, in reasonable detail, how the contractor will meet the requirements of Section A, Engine Requirements. 1. The Construction Emissions Minimization Plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used. 2. The project sponsor shall ensure that all applicable requirements of the Construction Emissions Minimization Plan have been incorporated into the contract specifications. The plan shall include a certification statement that the contractor agrees to comply fully with the plan. 3. The contractor shall make the Construction Emissions Minimization Plan available to the public for review onsite during working hours. The contractor shall post at the construction site a legible and visible sign summarizing the plan. The sign shall also state that the public may ask to inspect the plan for the project at any time during working hours and shall explain how to request to inspect the plan. The contractor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way. D. *Monitoring.* After start of construction activities, the contractor shall submit quarterly reports to the ERO documenting compliance with the Construction Emissions Minimization Plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the plan.				
Mitigation Measure M-AQ-2b: Low-VOC Architectural Coatings. The project sponsor shall use low- and super-compliant VOC architectural coatings during construction. "Low-VOC" refers to paints that meet the more stringent regulatory limits in South Coast Air Quality Management District rule 1113; however, many manufacturers have reformulated to levels well below these limits. These are referred to as "Super-Compliant" architectural coatings.	Project sponsor	During construction	Planning Department (ERO)	Considered complete upon Planning Department review and approval of documentation of compliance
Mitigation Measure M-AQ-2c: On-Road Truck Emissions Minimization for the Compressed Construction Schedule. Under the compressed three-year construction schedule for either the Developer's Proposed Option or the Additional Housing Option, the project sponsor or the project sponsor's contractor shall comply with the following: A. *Engine Requirements*. The project sponsor shall ensure that all on-road heavy-duty diesel trucks with a gross vehicle weight rating of 19,500 pounds or greater used at the project site (such as haul trucks, water trucks, dump trucks, concrete trucks, and vendor trucks) be model year 2014 or newer. B. *Waivers*. The ERO may waive the engine year requirements of Subsection (A)(1) for on-road heavy duty diesel vendor trucks delivering materials to the project site, which could include window, door, cabinet, or elevator equipment if each vendor truck entering the project site is used only once for a single delivery of equipment or material. If the ERO grants the waiver, the contractor must demonstrate that that vendor truck would only be used once for a single delivery to the project site. Waivers to the engine year requirements of Subsection (A)(1) shall not be included for vendor trucks that import or off-haul soil, transport heavy earthmoving equipment, or ready-mix concrete, or deliver lumber. C. *Construction Emissions Minimization Plan.* The construction minimization requirements of Mitigation Measure M-AQ-2a item (C). D. *Monitoring.* The monitoring requirements of Mitigation Measure M-AQ-2a item (D).	Project sponsor and contactor	Implement prior to and during construction activities for the compressed construction schedule	Planning Department (ERO). ERO to review draft construction emissions minimization plan prior to issuance of first demolition or construction permit and final plan at the start of demolition or construction. ERO to review quarterly and final monitoring reports.	Considered complete upon Planning Department review and approval of documentation and completion of construction.
Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule. Under the compressed three-year construction schedule for either the Developer's Proposed Option or the Additional Housing Option, the project sponsor shall implement this measure. Prior to issuance of the final certificate of occupancy for the final building associated with Phase 1, the project sponsor, with the oversight of the Environmental Review Officer (ERO), shall either:	Project sponsor	*Offset program*: Prior to issuance of final certificate of occupancy for final building constructed, notify the ERO within six months of completion of the offset project(s)	*Offset program*: Planning Department (ERO)	*Offset program*: Considered complete upon approval of documentation of offset projects implemented

MITIGATION MONITORING AND REPORTING PROGRAM FOR BALBOA RESERVOIR PROJECT

Measures Adopted as Conditions of Approval	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Schedule and Verification of Compliance
1. Directly fund or implement a specific offset project within San Francisco if available to achieve the equivalent to a one-time reduction of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option. To qualify under this mitigation measure, the specific emissions offset project must result in emission reductions within the San Francisco Bay Area Air Basin that would not otherwise be achieved through compliance with existing regulatory requirements. A preferred offset project would be one implemented locally within the City and County of San Francisco. Prior to implementing the offset project, it must be approved by the ERO. The project sponsor shall notify the ERO within six months of completion of the offset project for verification; or 2. Pay mitigation offset fees to the Bay Area Air Quality Management District Bay Area Clean Air Foundation or other governmental entity or third party. The mitigation offset fee shall fund one or more emissions reduction projects within the San Francisco Bay Area Air Basin. The fee will be determined by the ERO, the project sponsor, and the governmental entity or third party responsible for administering the funds, and be based on the type of projects available at the time of the payment. This fee is intended to fund emissions reduction projects to achieve reductions of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option, which is the amount required to reduce emissions below significance levels after implementation of other identified mitigation measures as currently calculated. The agreement that specifies fees and timing of payment shall be signed by the project sponsor, the governmental entity or third party responsible for administering the funds, and the ERO prior to issuance of the first site permit. This offset payment shall total the predicted 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option above the 10-ton-per-year threshold after implementation of Mitigation Measures M-AQ-2a, M-AQ-2b, and M-AQ-2c. The total emission offset amount presented above was calculated by summing the maximum daily construction of ROG and NOx (pounds/day), multiplying by 260 work days per year, and converting to tons. The amount represents the total estimated operational and construction-related ROG and NOx emissions offsets required. No reductions are needed for operations or overlapping construction and operations.		and/or *Mitigation Fee*: Sign agreement prior to issuance of first site permit. Pay amount determined at time of impact	*Mitigation Fee*: BAAQMD or other governmental entity or third party	*Mitigation Fee*: Considered complete upon BAAQMD/other governmental entity/third party confirmation of receipt of payment
Mitigation Measure M-AQ-4a: Diesel Backup Generator Specifications. To reduce ROG and NOx associated with operation of the proposed project, the project sponsor shall implement the following measures: A. All new diesel backup generators shall: 1. Have engines that meet or exceed California Air Resources Board Tier 4 off-road emission standards which have the lowest NOx emissions of commercially available generators; and 2. Be fueled with renewable diesel, if commercially available, which has been demonstrated to reduce NOx emissions by approximately 10 percent. B. All new diesel backup generators shall have an annual maintenance testing limit of 50 hours, subject to any further restrictions as may be imposed by the Bay Area Air Quality Management District in its permitting process. C. For each new diesel backup generator permit submitted to Bay Area Air Quality Management District for the project, the project sponsor shall submit the anticipated location and engine specifications to the San Francisco Planning Department ERO for review and approval prior to issuance of a permit for the generator from the San Francisco Department of Building Inspection. Once operational, all diesel backup generators shall be maintained in good working order for the life of the equipment and any future replacement of the diesel backup generators shall be required to be consistent with these emissions specifications. The operator of the facility at which the generator is located shall be required to maintain records of the testing schedule for each diesel backup generator for the life of that diesel backup generator and to provide this information for review to the planning department within three months of requesting such information.	Project sponsor and facility operator, Planning Department.	Prior to issuance of a permit for diesel backup generator specifications. Ongoing for maintenance, testing, and records keeping.	Planning Department (ERO) and DBI	Equipment specifications portion considered complete when equipment specifications approved by ERO. Maintenance portion is ongoing and records are subject to Planning Department review upon request.
Mitigation Measure M-AQ 4b: Install MERV 13 Filters at the Daycare Facility. If the daycare facility is constructed as part of Phase 1 and is operational while Phase 2 is under construction, the project sponsor shall install a mechanical ventilation system at the onsite daycare facility located in Block B capable of achieving the protection from particulate matter (PM2.5) equivalent to that associated with a Minimum Efficiency Reporting Value (MERV) 13 filtration (as defined by American Society of Heating, Refrigerating and Air-Conditioning Engineers [ASHRAE] standard 52.2). The system must meet the requirements of San Francisco Health Code article 38 and San Francisco Building Code section 1203.5.	Project sponsor	Prior to issuance of final certificate of occupancy for building containing daycare.	Planning Department (ERO) and DBI.	Considered complete upon ERO and DBI acceptance of documentation of compliance prior to issuance of a certificate of occupancy.
Cultural Resources (Archeological Resources) Mitigation Measures				
Mitigation Measure M-CR-2: Accidental Discovery of Archeological Resources (PEIR Mitigation Measure AM-1). The project sponsor shall distribute the planning department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils-disturbing activities within the project site. Prior to any soils-disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The project	Project sponsor, contractor, qualified archaeological consultant, and Planning Department (ERO).	During soil-disturbing activities.	Planning Department (ERO).	Considered complete upon ERO's approval of FARR.

MITIGATION MONITORING AND REPORTING PROGRAM FOR BALBOA RESERVOIR PROJECT

Measures Adopted as Conditions of Approval	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Schedule and Verification of Compliance
sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet. Should any indication of an archeological resource be encountered during any soils-disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils-disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken. If the ERO determines that an archeological resource may be present within the project area, the project sponsor shall retain the services of an archeological consultant from the pool of qualified archeological consultants maintained by the planning department archeologist. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor. Measures might include: preservation in situ of the archeological resource; an archeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Environmental Planning (EP) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions. The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report. Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound copy, one unbound copy and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.				
Mitigation Measure M-CR-3: Accidental Discovery of Human Remains. The treatment of human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity shall comply with all applicable state and federal laws. This shall include immediate notification of the Medical Examiner of the City and County of San Francisco and, in the event of the Medical Examiner's determination that the human remains are Native American remains, notification of the Native American Heritage Commission, which shall appoint a Most Likely Descendant (MLD).The MLD shall complete his or her inspection and make recommendations or preferences for treatment and disposition within 48 hours of being granted access to the site (Public Resources Code section 5097.98). The Environmental Review Officer (ERO) shall also be notified immediately upon discovery of human remains. The project sponsor and the ERO shall make all reasonable efforts to develop a Burial Agreement ("Agreement) with the MLD, as expeditiously as possible for the treatment and disposition, with appropriate dignity, of the human remains and associated or unassociated funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). The Agreement shall take into consideration the appropriate excavation, removal, recordation, scientific analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. If the MLD agrees to scientific analyses of the remains and/or associated or unassociated funerary objects, the archeological consultant shall retain possession of the remains and associated or unassociated funerary objects until completion of any such analyses, after which the remains and associated or unassociated funerary objects shall be reinterred or curated as specified in the Agreement. Nothing in existing state regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. However, if the ERO, project sponsor, and MLD are unable to reach an agreement on scientific treatment of the remains and associated or unassociated funerary objects, the ERO, in cooperation with the project sponsor, shall ensure that the remains and associated or unassociated funerary objects are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance (Public Resources Code section 5097.98). Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during soil-disturbing activity additionally shall follow protocols laid out in the project's archeological treatment documents, and any agreement established between the project sponsor, the Medical Examiner and the ERO.	Project sponsor and contractor, archaeological consultant, ERO in consultation with the Coroner of the City and County of San Francisco, Native American Heritage Commission, and Most Likely Descendant.	In the event human remains and/or funerary objects are encountered, during soil-disturbing activity; immediately, upon each such discovery	Planning Department (ERO)	Considered complete on notification of the San Francisco County Coroner and ERO, and if Native American remains are discovered, then notification to NAHC, and MLD, and completion of treatment agreement and/or analysis and reporting.
Tribal Cultural Resources Mitigation Measures				
Mitigation Measure M-TC-1: Tribal Cultural Resources Interpretive Program. If the Environmental Review Officer (ERO) determines that a significant archeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource and that the	Planning Department (ERO), Native American tribal representatives, archaeological consultant, project sponsor.	In the event tribal cultural resources are encountered during soil-disturbing activity.	Planning Department (ERO).	Considered complete if no Tribal Cultural Resource is discovered or Tribal Cultural Resource is discovered and either preserved in-

MITIGATION MONITORING AND REPORTING PROGRAM FOR BALBOA RESERVOIR PROJECT

Measures Adopted as Conditions of Approval	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Schedule and Verification of Compliance
resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible. If the ERO determines that preservation-in-place of the tribal cultural resource is both feasible and effective, then the archeological consultant shall prepare an archeological resource preservation plan (ARPP). Implementation of the approved ARPP by the archeological consultant shall be required when feasible. If the ERO, in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the project sponsor shall implement an interpretive program of the tribal cultural resource in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.				place or project effects to Tribal Cultural Resource are mitigated by implementation of Planning Department approved interpretive program.
Geology and Soils Mitigation Measures				
Mitigation Measure M-GE-6: Inadvertent Discovery of Paleontological Resources. Before the start of excavation activities, the project sponsor shall retain a qualified paleontologist, as defined by the Society of Vertebrate Paleontology, who is experienced in on-site construction worker training. The qualified paleontologist shall complete an institutional record and literature search and train all construction personnel who are involved with earthmoving activities, including the site superintendent, regarding the possibility of encountering fossils, the appearance and types of fossils that are likely to be seen during construction, the proper notification procedures should fossils be encountered, and the laws and regulations protecting paleontological resources. If potential vertebrate fossils are discovered by construction crews, all earthwork or other types of ground disturbance within 25 feet of the find shall stop immediately and the monitor shall notify the Environmental Review Officer. The fossil should be protected by an "exclusion zone" (an area approximately 5 feet around the discovery that is marked with caution tape to prevent damage to the fossil). Work shall not resume until a qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the qualified paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. The qualified paleontologist may also propose modifications to the stop-work radius and the monitoring level of effort based on the nature of the find, site geology, and the activities occurring on the site, and in consultation with the Environmental Review Officer. If treatment and salvage is required, recommendations shall be consistent with Society of Vertebrate Paleontology's 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, and currently accepted scientific practice, and shall be subject to review and approval by the Environmental Review Officer. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection (e.g., the University of California Museum of Paleontology), and may also include preparation of a report for publication describing the finds. Upon receipt of the fossil collection, a signed repository receipt form shall be obtained and provided to the planning department. The qualified paleontologist shall prepare a paleontological resources report documenting the treatment, salvage, and, if applicable, curation of the paleontological resources. The project sponsor shall be responsible for the costs necessary to prepare and identify collected fossils, and for any curation fees charged by the paleontological repository. The planning department shall ensure that information on the nature, location, and depth of all finds is readily available to the scientific community through university curation or other appropriate means.	Prior to excavation: project sponsor and qualified paleontological consultant During construction: project sponsor and contractor	Institutional record and literature search: before issuance of a demolition permit. Worker training: before the start of excavation activities During construction	Planning Department (ERO) Planning Department (ERO)	Considered complete upon ERO acceptance of documentation of compliance Considered complete upon ERO acceptance of documentation of compliance

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Date

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Stuart M. Flashman