

CHAPTER 5 OTHER CEQA CONSIDERATIONS

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, an EIR must identify the following three types of impacts:

- Significant environmental effects that cannot be avoided if the proposed project is implemented;
- Significant irreversible environmental effects that would be involved in the proposed project should it be implemented; and
- Growth-inducing impacts of the proposed project.

The following sections identify each of these types of impacts based, in part, on analyses contained in Chapter 4, Environmental Setting, Impacts, and Mitigation.

5.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Pursuant to Section 15126.2(b) of the CEQA Guidelines, this section identifies significant impacts that would not be avoided, even with the implementation of feasible mitigation measures. The final determination of significance of impacts and of the feasibility of mitigation measures would be made by the Board of Trustees of the California State University as part of their EIR certification action.

A summary of the environmental impacts and mitigation measures is contained in Chapter I of this EIR. Chapters 4.1 through 4.5 provide a comprehensive identification of the Project's environmental effects, including the level of significance both before and after mitigation. These sections also specifically indicate whether the Project would result in new or increased impacts over those identified in the 2007 Campus Master Plan (CMP) EIR.

5.1.1 Significant and Unavoidable Impacts of CMP

The following significant and unavoidable impacts would result from development proposed under the CMP. Potentially significant and unavoidable environmental impacts associated with implementation of the CMP were identified for cultural resources, noise, and transportation. These impacts are described below, along with the related conclusions for the Project:

- **Cultural Resources** – Implementation of the CMP could result in a substantial adverse change in the significance of historical buildings or structures (Impact CULT-2), if recordation of the historic resource would not reduce the impact to less than significant.

Chapter 4.4 of this EIR concludes that there is a new significant cumulative historic resources impact associated with this Project. See further discussion in the section below.

- **Noise** – Implementation of the CMP could result in a significant and unavoidable impact related to excessive airborne noise during the construction of campus facilities in proximity to sensitive receptors (Impact NOIS-1).

The Tiered Initial Study for this Project (Appendix A) concluded that there could potentially be some Project construction activities where the noise levels would not be reduced to levels below the threshold, even with the recommended mitigation. Therefore, conservatively, the Project impact would be significant and unavoidable, as concluded in the 2007 CMP EIR, but no new or increased impacts would occur with the Project. Such an impact would be temporary and would only exist during construction activities.

- **Transportation** – Implementation of the CMP could potentially contribute substantial traffic at two intersections in southwest San Francisco if campus development results in the PM peak hour trip generation estimated in the CMP EIR (Impact TRA-1).

Chapter 4.5 of this EIR indicates that the Project would not generate PM peak hour vehicle trips above what was studied in the 2007 CMP EIR. Campus-wide PM peak hour vehicle trips have actually declined substantially since the CMP EIR base year such that even with Project implementation, campus-wide trip generation would remain below the CMP EIR base year. Therefore, the impact would be less than significant, as the Project would not contribute to substantially increased vehicle traffic at intersections in the study area. There are no new significant or increased impacts compared to the CMP EIR, as a result of vehicle trips generated by the Project.

A Statement of Overriding Considerations (SOC) for these impacts was adopted by the Trustees of the California State University at the time the CMP Final EIR was certified. The only new significant impact associated with the Project that was not identified in the CMP EIR relates to historic resources and is described below.

5.1.2 New Significant and Unavoidable Impacts of Project

The Project would result in less-than-significant impacts on the Parkmerced Historic District and the Parkmerced Remnant Historic District, identified during the preparation of this EIR, as the Project alone would not materially impair the significance of these districts (see Chapter 4.4, Project Impacts Cult-2A and Cult-2B). However, the Project would have a significant adverse cumulative impact related to historical resources. The proposed demolition of Blocks 1 and 6 and removal of existing landscape features on the Project site would contribute to a significant cumulative impact on the historic significance of the Parkmerced Remnant Historic District, as it would erode its integrity. The Project's contribution to this significant cumulative

impact would be cumulatively considerable (See Chapter 4.4, Project Impact CULT-5B). This significant cumulative impact can be reduced through the implementation of CMP EIR Mitigation CULT-2A through CULT-2C as part of the Project and through the implementation of Project Mitigation CULT-5B identified in Chapter 4.4. However, the impact is significant and unavoidable as the implementation of the feasible mitigation measure would not reduce the impact to less than significant. This is considered a new significant cumulative impact, as the CMP EIR did not contemplate impacts to eligible historic districts and did not identify a significant cumulative impact on historic resources.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The CEQA Guidelines (Section 15126.2(c)) requires that an EIR discuss the extent to which a project, during its initial or continued phases (i.e., construction and operations), would result in commitment of nonrenewable resources that future generations would be unable to reverse. An impact would fall into this category if:

- The project would involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of a project would generally commit future generations to similar uses (e.g., a highway provides access to a previously remote area);
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The phasing of the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Development of the Project, which is consistent with the 2007 CMP, would result in the continued commitment of the San Francisco State University (SF State) campus to institutional and related uses, thereby precluding any other uses for the lifespan of the campus. The California State University System's ownership of the campus represents a long-term commitment of the campus lands to institutional and related uses. Restoration of the Project site and campus to pre-developed conditions is not feasible given the degree of disturbance, the urbanization of the area, the level of capital investment, and SF State's educational mission.

Resources that will be permanently and continually consumed by Project implementation include water, electricity, natural gas, and fossil fuels; however, the consumption of these resources would not represent unnecessary, inefficient, or wasteful use of resources. Construction activities related to the Project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil, natural gas, and gasoline) for automobiles and construction equipment, and other resources including, but are not limited to, lumber, sand, gravel, asphalt, metals, and water. The irretrievable

commitment of the above-listed resources is considered justified to achieve the overall goals and objectives of the proposed Project; however, as described below, various measures to reduce water and energy use are incorporated into the Project.

The Project would include installation of recycled water infrastructure to accept the supply of recycled water from the City and County of San Francisco when available and SF State would explore other water reuse strategies to reduce water use. Targeted strategies could include ultra-water-efficient bathroom fixtures, dual plumbing to allow use of recycled water for toilet and urinal flushing, and recycled water infrastructure for irrigation. The use of non-potable water during construction for soil compaction and dust control would also be considered, if feasible.

The campus has also instituted lighting and other energy conservation measures and has been replacing in-building lighting systems with up-to-date energy-saving equipment. New Project buildings would be designed to achieve at least LEED Gold or equivalent performance, and energy efficiency beyond Title 24 requirements. LEED Platinum and zero net energy would be targeted using a combination of advanced green building and energy efficiency measures, on-site renewable energy, district energy strategies, and/or renewable energy credits. On-site renewable energy could include roof-mounted solar arrays. The efficiency measures to be incorporated could include high efficiency HVAC equipment, daylight harvesting, highly insulated wall assemblies, high-performance glazing, and similar strategies.

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the Project. While the campus uses, transports, stores, and disposes of hazardous wastes, the campus complies with all applicable state and federal laws and existing campus programs, practices, and procedures related to hazardous materials, which reduces the likelihood and severity of accidents that could result in irreversible environmental damage. Over the campus history, there has never been an accident that resulted in irreversible environmental damage, indicating that current practices with respect to hazardous materials handling are adequate, and thus the potential for the Project to cause irreversible environmental damage from an accident or upset of hazardous materials, is very low.

5.3 GROWTH INDUCING IMPACTS

Growth-inducing impacts refer to the ways in which a proposed project may directly or indirectly influence or foster economic development, population growth, or the construction of additional housing in the project area as well as its impacts to the surrounding environment (CEQA Guidelines Section 15126.2(d)). Growth can be induced in a number of ways, including the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of removing obstacles to growth relates directly to the removal of infrastructure limitations or regulatory constraints that could result in growth unforeseen at the time of project approval.

A project may have direct and/or indirect growth inducement potential. Direct growth of development and population would result if a project includes construction of new housing or establishes substantial new permanent employment opportunities (or, in the case of SF State, would accommodate new enrollment), which would stimulate demand for additional housing and services in the surrounding area. A project also could directly induce growth if it would involve a construction effort with substantial short-term employment opportunities, particularly if construction employees are likely to relocate to the area.

A project would have an indirect growth inducement effect to the extent that spending for project development and by students and employees associated with the project stimulates economic development (jobs) in the surrounding area, such that the demand for housing, public services and other development increases.

The proposed Project was included in the CMP building program and related development assumptions. Section 4.10, Population and Housing, and Section 6.3, Growth Inducement of the 2007 CMP EIR, addressed anticipated direct and indirect growth impacts related to campus development under the CMP. The Project includes construction of Creative Arts buildings and on-campus housing for existing students. The Project would not contribute to direct population growth on the campus, as it would not increase enrollment or faculty and would not substantially increase staff, as reported on in Chapter 3, Project Description of this EIR. The Project could contribute to indirect employment growth as an increase in the residential population on campus could result in campus-serving businesses moving into the area or expansion of existing businesses in response to increased demand for goods and services. The retail portion of the Project is expected to serve some or most of this demand. Other campus-related indirect and induced employment growth could result in some other commercial development on lands that are underutilized, especially in those parts of San Francisco that are near the campus. However, it is anticipated that there would not be any major shifts in land use planning in San Francisco and that future growth would continue to emphasize redevelopment, as anticipated in local plans and forecasts, because most of San Francisco is built out. If and when specific commercial development projects are proposed, they will be subject to environmental review. Induced employment growth in the vicinity of campus would not be expected to stimulate employees to move into San Francisco, as this type of commercial project would be expected to draw employees from the local market.

The Project would not add new capacity to existing utilities or extend services into areas that are currently unserved. Rather, the Project would be connected to existing utility infrastructure and the Project's utility connections would not serve off-campus areas or lead to urban growth outside the boundary of the campus. No changes to off-campus utilities provided to SF State by other entities are anticipated to be necessary to serve the needs of the Project. Therefore, the Project would not remove obstacles to growth or encourage growth through the provision of

new and essential public services or access opportunities. The Project would not result in urbanization of land in a remote location, resulting in “leapfrog” development, because the Project site is located in an urbanized area that is served by an existing extensive network of electricity, water, sewer, storm drain, communications, roadways, and other infrastructure sized to accommodate or allow existing and planned future growth. Overall, no new growth-inducing effects would be expected as a result of implementing the Project.