CHAPTER 7
RESPONSE TO COMMENTS

7.1 INTRODUCTION

This chapter contains the comment letters received in response to the draft environmental impact report (EIR) during the public review period (September 27, 2016 through November 11, 2016) and at the public meeting to receive comments on the Draft EIR held on October 18, 2016, for the Creative Arts & Holloway Mixed-Use Project (Project). Each comment letter is numbered, each individual comment within a letter is bracketed and numbered, and responses are provided to each comment following each letter. The responses amplify or clarify information provided in the Draft EIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the Project unrelated to its environmental impacts) are either discussed or noted for the record. Where text changes in the Draft EIR are warranted based on comments received, on updated Project description information, or on information provided by San Francisco State University (SF State) staff, those changes are included in underline/strikeout text in this Final EIR. This chapter, in its entirety, is new in the Final EIR. Given that, it is not underlined, but should be considered new text.

The changes to the information contained in the Draft EIR represent only minor clarifications/amplifications and do not constitute significant new information resulting in a new significant impact. In accordance with the California Environmental Quality Act (CEQA) Guidelines, Section 15088.5, recirculation of the Draft EIR is not required.

7.2 RESPONSES TO COMMENTS

A list of all commenters is provided in Table 7-1, followed by the comment letters and responses.

Table 7-1
List of Commenters

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<th>Letter Number</th>
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<td>1</td>
<td>11/10/16</td>
<td>Department of Toxic Substances Control (Harold Duke)</td>
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<td>2</td>
<td>10/20/16</td>
<td>San Francisco Municipal Transportation Agency (Charles Rivasplata)</td>
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<td>3</td>
<td>11/7/16</td>
<td>San Francisco Public Utilities Commission (Irina Torrey)</td>
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<td>10/18/16</td>
<td>Lakeside Park Owners Association (Ralph Chern)</td>
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<td>5</td>
<td>11/9/16</td>
<td>Parkmerced, Maximus Real Estate Partners (Bert Polacci)</td>
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<td>6</td>
<td>11/10/16</td>
<td>San Francisco State University, University Property Management (Linda Jo Morton)</td>
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# Table 7-1
List of Commenters

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<th>Letter Number</th>
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<tr>
<td>7</td>
<td>11/11/16</td>
<td>Mani Drayton</td>
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<tr>
<td>8</td>
<td>10/20/16</td>
<td>Aaron Goodman</td>
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November 10, 2016

Ms. Wendy Bloom
Campus Planner
Capital Planning, Design & Construction
San Francisco State University
1600 Holloway Avenue
San Francisco, California 94131

REVIEW OF NOTICE OF COMPLETION OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CREATIVE ARTS & MIXED-USE PROJECT, SAN FRANCISCO, SAN FRANCISCO COUNTY (SCH #2016072013)

Dear Ms. Bloom:

The Northern California Schools Unit of the Department of Toxic Substances Control (DTSC) has reviewed the Notice of Completion (NOC) for a draft Environmental Impact Report (EIR) for the Creative Arts & Holloway Mixed-Use project (Project) proposed by the San Francisco State University (SF State). The due date to submit comments is November 10, 2016.

SF State proposes to develop the Creative Arts and Holloway Mixed-Use project in the southern portion of the SF State campus (Site). The Project includes the construction of the Creative Arts replacement building, an associated concert hall, and a mixed-use development including student housing, neighborhood-serving retail, and student support services.

Based on a review of the NOC, DTSC would like to provide the following comments:

1. Because the Project is school site related, DTSC recommends that an environmental review, such as a Phase 1 Environmental Site Assessment (Phase 1) and/or Preliminary Endangerment Assessment (PEA), be conducted for the Site to determine whether there has been or may have been a release or threatened release of a hazardous material, or whether a naturally occurring hazardous material is present based on reasonably available information about the property and the
area in its vicinity. Such an environmental review should generally be conducted as part of the California Environmental Quality Act (CEQA) process. If SF State elects to proceed to conduct an environmental assessment at the Site under DTSC oversight, it should enter into a Voluntary Cleanup Agreement with DTSC to oversee the preparation of the environmental assessment. Alternatively, DTSC recommends SF State continue to investigate, and clean up if necessary, the Site under the oversight of the City and County of San Francisco and in concurrence with all applicable DTSC guidance documents.

2. The presence of existing, older or former structures at the Site may result in potential environmental concerns due to lead from lead-based paint and/or organochlorine pesticides from termicide applications and polychlorinated biphenyls (PCBs) from electrical transformers, light ballast or window caulking or glazing. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC’s "Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termicide, and Polychlorinated Biphenyls from Electrical Transformers, dated June 9, 2006", and in accordance with the recommendations provided in the United States Environmental Protection Agency’s website “PCBs in Caulk in Older Buildings” (http://www.epa.gov/pcbsincaulk/index.htm).

3. If the Site was previously used for agricultural purposes, pesticides (such as DDT, DDE, and toxaphene) and fertilizers (usually containing heavy metals) commonly used as part of agricultural operations are likely to be present. These agricultural chemicals are persistent and bio-accumulative toxic substances. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with the “Interim Guidance for Sampling Agricultural Soils (Third Revision)”, dated August 2008. This guidance should be followed to sample agricultural properties where development is anticipated.

4. The Site appears to be located within 10-miles of a geological unit potentially containing naturally occurring asbestos (NOA). Pursuant to DTSC’s “Interim Guidance – Naturally Occurring Asbestos at School Sites, Revised September 24, 2004”, further action should be considered and conducted to determine whether a naturally occurring hazardous material (i.e., NOA) is present, based on reasonably available information about the properties and the areas in their vicinity, and a soil assessment pursuant to the DTSC’s NOA guidance.

5. If a response action is required based on the results of the above investigations, and/or other information, the EIR will require an analysis of the potential public health and environmental impacts associated with any proposed response action, pursuant to requirements of the CEQA (Pub. Resources Code, Division 13, section
Ms. Wendy Bloom  
November 10, 2016  
Page 3

21000 et seq.), and its implementing Guidelines (California Code of Regulations,  
Title 14, section 15000 et seq.), prior to approval or adoption of an EIR for the  
Project. A discussion of the mitigation and/or removal actions, if necessary, and  
associated cumulative impacts to the Project properties and the surrounding  
environment, should be included in the EIR. If sufficient information to discuss  
the proposed mitigation and/or removal actions, and their associated impacts to the  
Project properties and the surrounding environment, are not available for inclusion in  
the EIR, then an Addendum or Supplement to the EIR may be required.

DTSC is also administering the Revolving Loan Fund (RLF) Program which provides  
revolving loans to investigate and clean up hazardous materials at properties where  
redevelopment is likely to have a beneficial impact to a community. These loans are  
available to developers, businesses, schools, and local governments.

For additional information on DTSC’s Schools process or RLF Program, please visit  
DTSC’s web site at www.dtsc.ca.gov. If you would like to discuss this matter further,  
please contact me at (916) 255-3695, or via email at bud.duke@dtsc.ca.gov.

Sincerely,

[Signature]

Harold (Bud) Duke, PG  
Senior Engineering Geologist  
Northern California Schools Unit  
Brownfields and Environmental Restoration Program

cc: (via email)  
State Clearinghouse (State.clearinghouse@opr.ca.gov)  
Office of Planning and Research  
Michael O’Neill (MONeill@ced.ca.gov)  
Department of Education – Sacramento, CA  
Lisa Constancio (LConstancio@ced.ca.gov)  
Department of Education – Sacramento, CA  
Jackie Buttle (Jackie.Buttle@dtsc.ca.gov)  
DTSC CEQA Tracking Center – Sacramento, CA  
Jose Salcedo (Jose.Salcedo@dtsc.ca.gov)  
DTSC Schools Unit – Sacramento, CA
Response to Comment Letter 1

Department of Toxic Substances Control
Harold (Bud) Duke, PG
November 10, 2016

This comment recommends that a Phase I Environmental Site Assessment be conducted for the site to determine whether there has been a release of a hazardous material in the vicinity. This comment also indicates that the information from a Phase I Environmental Site Assessment should be included in the CEQA document for the Project.

As described in Chapter 2, Introduction, of this Final EIR, the EIR for this Project is tiered to the 2007 Campus Master Plan (CMP) EIR (SCH No. 2006102050) (SF State 2007a). A Tiered Initial Study was prepared and is attached as Appendix A to this EIR to identify the issues that were adequately addressed in the 2007 CMP EIR and to identify the issues that would require further analysis in this EIR. The tiered project-level evaluation provided in the Tiered Initial Study (Section 4.8 of the Initial Study) addresses the potential impacts of the Project related to hazards and hazardous materials. The CMP EIR and Tiered Initial Study conclusions about hazardous materials contamination are summarized below.

As cited in Section 4.6 of the CMP EIR, numerous Phase I Environmental Site Assessments were conducted for various locations on the SF State campus, including the former Parkmerced properties acquired by SF State. CMP EIR Impact HAZ-3 indicates that the campus is not on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. There are no known sites with soil or groundwater contamination on the campus, and several former underground storage tank or leaking underground storage tank sites on campus have been remediated and contamination is no longer a concern. As reported in the CMP EIR, the SF State Office of Environmental Health and Occupational Safety is not aware of any existing contaminated sites on campus. Also, the past uses of the campus are well known and are not likely to have resulted in soil or groundwater contamination. Due to the low probability of any remaining contaminated locations on campus, CMP EIR Impact HAZ-3 was determined to be less than significant.

Appendix A, the Tiered Initial Study for the Project, includes an updated database and file review for the Project site to provide a characterization of current conditions. Based on this review, conditions have not changed on the campus or the Project site, and the impact related to soil and groundwater contamination is less than significant, as was concluded in the 2007 CMP EIR.
This comment indicates that older structures have the potential for lead-based paint, pesticides, termiticides, and polychlorinated biphenyls (PCBs) from electrical transformers, light ballasts, etc. DTSC recommends that these concerns be investigated and possibly mitigated.

**Asbestos, Lead-Based Paint, and Other Regulated Materials.** The CMP EIR determined that the demolition or renovation of laboratory buildings could potentially expose construction workers and campus occupants to contaminated building materials (CMP EIR Impact HAZ-4), a potentially significant impact that could be reduced to less than significant through implementation of procedures for the proper demolition of laboratory space (CMP EIR Mitigation HAZ-4).

As indicated in the Tiered Initial Study (Appendix A), the Project would involve demolition of two-story residential buildings on Block 1 and Block 6, none of which are or have been used for laboratory space. However, the Initial Study indicates that buildings may contain asbestos building materials, lead-based paint, and/or other regulated materials such as fluorescent lights and electrical ballasts. A limited building survey conducted for the Phase 1 Environmental Site Assessment of Parkmerced (Building Analytics 1999) indicates that the garden apartments, such as those located in Blocks 1 and 6 on the Project site, likely contain asbestos building materials and lead-based paint.

Where present, asbestos, lead-based paint, and other regulated building materials would be abated prior to building demolition, as is required by state regulations. As indicated in the 2007 CMP EIR, the removal of asbestos-containing building materials is subject to the limitations and requirements of Bay Area Air Quality Management District Regulation 11, Rule 2: Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing. Additionally, Final EIR Section 3.7, Project Approvals, acknowledges the requirements under this Rule.

Lead-based-paint abatement would include removal of any lead hazard, which, according to Title 17 of the California Code of Regulations, includes deteriorated lead-based paint and lead-contaminated soil (soil contaminated with lead paint chips). As indicated in the 2007 CMP EIR, the California Occupational Safety and Health Administration lead standard for construction activities is implemented under Title 8 of the California Code of Regulations. The standard applies to any construction activity that may release lead dust or fumes, including manual scraping, manual sanding, heat gun applications, power tool cleaning, rivet busting, abrasive blasting, welding, cutting, or torch burning of lead-based coatings. Additionally, under California law, fluorescent lamps cannot be disposed of as municipal waste.
Fluorescent tubes and bulbs may be managed as universal waste under Title 22, Chapter 23 of the California Code of Regulations, and are typically recycled.

The campus would be required to conform with all applicable regulations related to the removal of asbestos-containing building materials, lead-based paint, and fluorescent lamps. Compliance with these regulations is required of all SF State’s construction and design/build contractors, as demonstrated in the campus’s construction and building practices. Final EIR Chapter 3, Project Description (page 3-19), has been revised to clarify that standard California State University (CSU) requirements and acceptable building practices include the abatement of hazardous building materials, per regulatory requirements and/or applicable Department of Toxic Substances Control (DTSC) guidance.

With implementation of these regulations and standards, impacts would be less than significant, as concluded in the 2007 CMP EIR. Therefore, no new or increased impacts related to the removal and disposal of these materials would result with implementation of the Project.

**Termiticides.** The Block 1 buildings are concrete structures; the foundation is poured concrete and the walls are scored concrete. Due to the lack of major wood building materials, it is unlikely that termiticides were applied around this building. The Block 6 buildings are stucco-covered wood-framed buildings constructed in 1944. In accordance with DTSC guidance (DTSC 2006), there is a possibility that termiticides, such as chlordane, were applied around the building foundation.

According to the DTSC 2006 guidance, chlordane was applied to shallow soils around buildings in the United States from 1948 until 1988 as a termiticide. There are very limited data evaluating this potential issue for multi-unit residential buildings in California. DTSC investigated three multi-unit residential buildings in Southern California and found elevated chlordane and dieldrin around all three buildings. DTSC further investigated soils around residential buildings at 18 sites throughout California and found elevated pesticide concentrations in 70% of the sites sampled.

As reported on in the Parkmerced EIR, a limited Phase II investigation was conducted in 2005 to assess potential environmental concerns associated with former operations at Parkmerced (CCSF 2010). Detectable concentrations of hazardous materials were found in 5 out of 28 samples. Materials found included the pesticides heptachlor, lindane, and chlordane. However, the concentrations of chemicals detected did not pose a threat to human health or the environment based on U.S. Environmental Protection Agency Region IX health-based screening values.
Further, the concentrations were below levels that typically may lead to a requirement for cleanup by regulatory agencies, and thus were not considered significant environmental concerns in the Parkmerced EIR (CCSF 2010). Although that is the case, Final EIR Chapter 3, Project Description (page 3-19), has been revised to clarify that standard CSU requirements and acceptable building practices include the abatement of hazardous building materials, per regulatory requirements and/or applicable DTSC guidance.

1-3 This comment recommends that if the Project site was previously used for agricultural purposes, pesticides and fertilizers are likely to be present and should be investigated and possibly mitigated.

As indicated in Section 4.4, Historic Resources, and Appendix D, Historic Resources Technical Report, of the Final EIR, during the early years of Spanish settlement in San Francisco, the shores of Lake Merced were used as common land for grazing cattle. It was not until 1835 that the land was privatized and granted to a rancher named Jose Antonio Galindo. The current site of Parkmerced formed part of the Rancho Laguna de la Merced. The Spring Valley Water Company purchased Lake Merced and the surrounding land in 1868 as part of a move to establish a monopoly over San Francisco’s water supply. The company began to sell off some of its land holdings by the 1890s.

In the Parkmerced Phase I Report conducted for the Parkmerced Property, including the former Parkmerced properties purchased by SF State, the oldest available aerial photograph from 1935 showed that the site was occupied by a golf course, agricultural land, and vacant undeveloped land (Building Analytics 1999). However, by 1946 the Parkmerced area was mostly developed and had some vacant land, and agricultural uses were not listed as uses by that time (Building Analytics 1999). The Parkmerced Phase I Report and the Parkmerced EIR (CCSF 2010) did not identify the potential for pesticide contamination in the Parkmerced area. As indicated in Response to Comment 1-3, a limited Phase II Investigation of the Parkmerced area indicated that pesticides do not pose a threat to human health or the environment. Therefore, sampling soils further for pesticides and fertilizers is not warranted.

1-4 This comment indicates that the Project site may contain naturally occurring asbestos and that further action should be considered to determine whether such material is present.
According to reviewed maps (California Department of Conservation 2000; USGS 2011), the site is located more than 3 miles from areas anticipated to have naturally occurring asbestos. According to the maps, the site is not located in an area likely to contain naturally occurring asbestos. Additionally, according to the 2001 Phase I ESA for Parkmerced Blocks 2, 5, and 6 (Building Analytics 2001), soils at the site vicinity include fine to medium sands of the Quaternary sand dune deposits and fine to medium grained sand with small to moderate amounts of silt and clay of the Colma Formation. Both of these sedimentary deposits are unlikely to contain asbestos.

1-5 This comment indicates that if a response action on the Project site is required, the EIR will require an analysis of the potential public health and environmental impacts associated with the response action.

See Response to Comment 1-1, which indicates that the Project impact related to soil and groundwater contamination is less than significant, based on Phase 1 Environmental Site Assessments and an updated database and file review for the Project site. See Responses to Comments 1-2 and 1-3, which indicate that hazardous building materials would be properly abated prior to building demolition.

1-6 This comment indicates that DTSC administers the Revolving Loan Fund Program, which provides loans to investigate and clean up hazardous materials at properties where redevelopment is likely to have a beneficial impact to the community.

This comment is noted for the record. See Responses to Comments 1-1 through 1-5 above for information about the potential for hazardous conditions to occur on the Project site.
MEMORANDUM

DATE: October 20, 2016
FROM: Charles Riverplata, SFMTA
TO: Wendy Bloom, San Francisco State University (SFSU)
THROUGH: Frank Markowitz, SFMTA
RE: San Francisco State University Creative Arts and Holloway Mixed-Use Project: Comments on the Focused Tiered Environmental Impact Report (EIR)

Staff at the SFMTA has reviewed the transportation-related sections of the Focused Tiered EIR for the San Francisco State University (SFSU) Creative Arts/Holloway Mixed-Use Project. Staff submits the following comments (below):

GENERAL COMMENT

Be sure to include sidewalk dimensions and curb cuts for the streets directly adjacent to the project area.

SPECIFIC COMMENTS

Page 1-14, Table 1-2: The top row is cut off after “transit….”

Page 2-14, Fourth Paragraph: On the first line, there is a typo. The text should read as follows:

“Varela Avenue, adjacent to the student housing/mixed-use building site…”

Varela Avenue is not included in the larger site plans, but is featured in Figure 3.6 (p. 3-31). It appears that there is only one real intersection (at Holloway). The pedestrian crossings along Varela would take place on a shared street–more like a plaza than a regular street–with shuttle and possible Muni existing. However, it would probably not feature regular auto use. What measures would be taken to improve pedestrian crossings at intersections along Varela?

Page 3-15, Second Paragraph: About how many daily deliveries of materials for the Creative Arts Building would need to be accommodated on the vacated Tapia Drive? Would accompanying signage alert pedestrians of infrequent deliveries on the vacated Tapia Drive?

Page 4-5, Second Paragraph (Roadway Network): On the first line, there is a typo. The report should read as follows:

“…served by two primary roadways: 10th Avenue (California State Route 1) and…”

In addition, it should be mentioned that State Highway 1 follows 10th Avenue from Lincoln Way to Junipero Serra Boulevard. North of this segment, State Highway 1 follows Crossover Drive and Park Presidio Boulevard to its junction with US 101 just south of the Golden Gate Bridge; and south of the segment, State Highway 1 follows Junipero Serra Boulevard to I-280.

1 South Van Ness Avenue 7th Floor, San Francisco, CA 94103 415.701.4500 www.sfmta.com
Page 4.5-1, Seventh Paragraph. For convenience, the text should indicate that Figure 4.5-1 is located on p. 4.5-33.

Page 4.5-5, First Paragraph. As background, the text should include a brief description of each of the four regional transit corridors listed, and their principal connections to the Muni services listed.

Page 4.5-5, First Bullet (28R, 19th Avenue Rapid). Outside of Muni Forward, SFMTA is planning to combine the 28R Line with the Geneva-Haney BRT—planned as early as 2023—to provide a one-seat ride between the 19th Avenue corridor/SFSU and Balboa Park/major growth areas in Southeast San Francisco, terminating in Candlestick Point/Hunters Point Shipyard, with exclusive lane treatments for bus rapid transit (BRT).

Page 4.5-8, First Bullet (Shuttle Service). Please indicate the daily shuttle ridership, line capacity and frequency. What areas do these free shuttles serve and do they operate on fixed schedules?

Page 4.5-12, Last Paragraph (Student Housing/Mixed-Use Building). Is the assumption that new on-campus student housing would be occupied by existing students reasonable?

Page 4.5-16, Table 4.5-4 (Total PM Net New Peak Hour Project Trip Generation – Event Day Only). Is the trip generation column for creative arts/concert hall correct? The sum of (a) the vehicle trips x carpool factor, and (b) the public transit, walk/bike and other trips, is 713 (less than the 804 total person trips listed in the table). In addition, the fourth footnote to the table (beyond “Walk/Bike”) is not listed.

Page 4.5-16, Second Paragraph. Staff appreciates the reference in the text to inconsistencies in the mode split data between Tables 4.5-2 and 4.5-4; however, is there any way of extracting data for bikes only from the “Walk/Bike” data? For the purposes of future bicycle planning, a clear indication of bicycle mode share in the area will be essential.

Page 4.5-24, Project Impact TRA 2 and Corresponding Mitigation Measures. Is any additional support being proposed for M-line/19th Avenue improvements? Can we respond directly to the West Portal shuttle triggers? What are the prospects of SFSU and Parkmerced eventually consolidating shuttles to West Portal?

Page 4.5-28, Last Paragraph. Where in the building would the Class I bike parking spaces be located? Please include this location on the site maps.

The SFMTA’s Transit Service Planning section is currently reviewing the Draft EIR and may have additional comments at a later time.
Response to Comment Letter 2
San Francisco Municipal Transportation Agency
Charles Rivasplata
October 20, 2016

2-1 This comment requests sidewalk dimensions and curb cuts for the streets adjacent to the Project area.

The Board of Trustees of the California State University will consider approval of schematic designs at the same time as they consider certification of the EIR for this Project. Due to this timeline, site plans with sidewalk dimensions are not yet available. However, as indicated in Final EIR Chapter 3, Project Description (page 3-14), the Project would provide for bulb-outs and wider sidewalks, consistent with the City and County of San Francisco’s (City) Better Street Plan. Additionally, any Project work in the City’s public rights-of-way, including any changes to sidewalks and streets, would require City approval through the City Department of Public Works Bureau of Street-Use and Mapping, as acknowledged in Final EIR Chapter 3, Project Description (Table 3-3, page 3-20). Therefore, the City would review and approve the sidewalk dimensions and curb cuts surrounding the Project site.

2-2 This comment states that information is cut off on page 1-14, Table 1-2.

The top of page 1-14 in Final EIR Chapter 1, Summary, provides a complete impact statement for CMP Impact TRA-2. The impact statement ends with the word “transit.”

2-3 This comment calls out the omission of the word “to” on the first line of the fourth paragraph on page 3-14. Additionally, the comment asks what measures would be taken to improve pedestrian crossings on Varela.

The identified typo has been corrected in Final EIR Chapter 3, Project Description (page 3-14). The Project would include improved pedestrian crossings on Varela Avenue. Due to the timeline for the Project (see Response to Comment 2-1), detailed plans for pedestrian crossing and amenities are not yet available. The final design of the Project’s proposed modifications in the public right-of-way, including pedestrian crossings, will be completed in consultation with City staff as part of the Project’s encroachment approval process through the City.

2-4 This comment asks about the number of deliveries and signage at the Creative Arts Building.
Commercial loading access from Holloway Avenue to the Creative Arts replacement building and concert hall would be controlled with bollards or signage similar to the designs of other mixed commercial loading and pedestrian spaces on campus. Additionally, signage regarding deliveries would be in place to warn pedestrians of potential deliveries. Based on delivery activity at the existing Creative Arts and Humanities buildings it is anticipated that deliveries along the vacated Tapia Drive would occur two to three times per week during the semester and less frequently during the summer. SF State’s Shipping and Receiving Department would also provide delivery service. However, these deliveries occur along Centennial Way, using an off-street cart or fork lift for heavier objects. It is anticipated that these types of deliveries would occur one to two times per day. Text has been added to Final EIR Chapter 3, Project Description (page 3-15), and Section 4.5, Transportation (page 4.5-27), to clarify this.

2-5 This comment identifies a typo and provides additional descriptive information for State Route 1.

The identified typo has been corrected in Final EIR Section 4.5, Transportation (page 4.5-3), and additional information regarding State Route 1 has been added to the same page.

2-6 This comment requests that the location of Figure 4.5-1 be noted within the text of Section 4.5, Transportation.

Figures follow the chapter text in all of the chapters, or in the case of Chapter 4, figures follow each major section (Section 4.1, Section 4.2, etc.). A sentence explaining this has been added to Final EIR Section 2.4, Organization, of this EIR (page 2-5).

2-7 This comment requests descriptions of all the transit carriers.

As described in Chapter 2, Introduction, of the Final EIR, the EIR for this Project is tiered to the 2007 CMP EIR. As such, the 2007 CMP EIR is incorporated by reference and referred to throughout this EIR. The 2007 CMP EIR and related documents are available at http://cpdc.sfsu.edu/plan. As stated in Section 4.5.1 of this Final EIR (page 4.5-5), detailed descriptions of other regional transit providers are provided in Section 4.11 of the 2007 CMP EIR.

2-8 This comment provides additional information regarding transit improvements, specifically regarding the 28R line and the Geneva Harvey BRT.
Text describing the new combined route for the 28R Line with the Geneva Harney bus rapid transit has been added to Final EIR Section 4.5, Transportation (page 4.5-6).

2-9 This comment requests more detailed information on the SF State shuttle including ridership, capacity, schedule, and frequency.

More details regarding the campus shuttle service have been added to Final EIR Section 4.5, Transportation (page 4.5-8). Once available data from 2016 has been processed, ridership information will be provided to SFMTA.

2-10 This comment questions the assumption that new on-campus student housing would be occupied by existing students.

As stated in Final EIR Chapter 3, Project Description (page 3-4), the Project would not result in substantial increases in SF State campus population over existing 2015–2016 levels. The student housing/mixed-use building would serve existing students that are currently commuting to campus. Although the building would continue to house students into the future, this additional housing capacity would serve existing enrollment levels and would not cause enrollment growth. Therefore, no changes to the description in Section 4.5, Transportation (page 4.5-12), are required. The campus is approaching its full-time-equivalent (FTE) ceiling (25,000 FTE students), based on Fall 2015 enrollment data, which was the most recent enrollment data available at the time the NOP was released. Additionally, the total number of students (headcount) has been flat since the 2007 CMP EIR was prepared. Therefore, the Project would not result in enrollment growth.

2-11 This comment asks for clarification on the sum of the trips in Table 4.5-4 as well as notes a missing footnote.

Footnote 4 was added to Table 4.5-4 in Section 4.5, Transportation (page 4.5-16). The first row of this Table shows the total person-trips to the Creative Arts replacement building and concert hall, including on- and off-campus trips. However, the mode splits in rows two through five only accounted for trips made by off-campus visitors. For clarity, the table has been revised to show all trips, regardless of whether they are on-campus or off-campus trips in rows two through five. As stated in Table 4.5-2 (Footnote 1), it is assumed that on-campus attendees would walk, bicycle, or use a form of transportation other than driving or transit. Therefore, the revision to Table 4.5-4 shows an increase in walk/bike trips, which accounts for the on-campus attendees who were formerly omitted and the sum of trips adds to 804 person trips once vehicle occupancy for carpools is accounted for. The changes to this table do not change the impact conclusions, as the pedestrian and bicycle trips...
can be accommodated with campus and Project sidewalk widths and bicycle facilities, as stated in Project Impacts TRA-3 and TRA-4 (pages 4.5-29 and 4.5-30).

2-12 This comment asks for extraction of the bike trips from the walk/bike mode split.

As stated in Section 4.5, Transportation (Table 4.5-3, Footnote 3, page 4.5-16), due to differences in the way the source data was collected, bike trips for the Project cannot be further extracted.

2-13 This comment asks for more information regarding M-line improvements, how SFMTA can respond to West Portal shuttle triggers, as well as the potential for consolidation of the Parkmerced and SF State shuttles.

As discussed in Final EIR Chapter 2, Introduction (page 2-1), the Board of Trustees of the California State University certified the SF State CMP EIR (SCH No. 2006102050) in 2007 (SF State 2007a). The Project conforms to the CMP building program and, therefore, the CEQA analysis for the Project is tiered to the 2007 CMP EIR.

As described in Section 4.5, Transportation (page 4.5-25), the 2007 CMP EIR concluded that implementation of the CMP could result in transit impacts, which would be mitigated by implementing improvements to service on 19th Avenue, providing interim shuttle service to West Portal if certain criteria are met, and extending shuttle service to the Daly City Bay Area Rapid Transit (BART) Station if the campus shuttle exceeds 85% capacity between campus and the BART station.

In 2007, the City and SF State entered into a Memorandum of Understanding (MOU) (SF State 2007c) that provided more detailed information on the conditions of funding from SF State for contribution to off-campus mitigation measures. SF State continues to maintain the M-line platform. SF State also contributed to the 19th Avenue Transit Study (SFCTA 2014). Funding contributions outlined in the MOU are triggered by milestones for improvements to the M-line, which have yet to occur. Funding will be provided in compliance with the criteria provided in the MOU.

The criteria for extending shuttle service to West Portal include the condition that the M-line improvements have not been implemented; that M-line average peak-period, peak-direction passenger loading between campus and West Portal Station exceeds 85% capacity; and if the cordon survey shows that peak-period transit trips on the M-line between campus and West Portal Station are greater than 5% above the baseline throughout the corridor. If all of these criteria are met, then SF State will extend campus shuttle service to West Portal Station. As of the end of 2016, during preparation of this Final EIR, the 5% increase in M-line transit trips criteria
had not been met, based on the most recent transportation survey conducted in 2016 (Nelson/Nygaard 2016).

The development of Parkmerced would include implementation of a new shuttle service to the Daly City BART Station. A low-emissions-vehicle shuttle to the Daly City BART Station would enter Parkmerced via Chumasero Drive, circulate through the site, then head south nonstop to the Daly City BART Station. Shuttles would operate every 7.5 minutes during peak periods, and every 15 minutes during off-peak periods. Although there have been no formal agreements with Parkmerced, SF State would consider combining shuttle service to provide one comprehensive service between Parkmerced, SF State, and the Daly City BART Station, if mutually beneficial.

2-14 This comment asks for the specific location of the bike parking.

Site plans are still conceptual and, therefore, the exact location of Class I bicycle parking has not yet been determined. However, as stated in Final EIR Chapter 3, Project Description (page 3-15), and Section 4.5, Transportation (page 4.5-28), secure, covered bicycle storage would be provided on the first floor of the new student housing/mixed-use building.

2-15 This comment notes that SFMTA’s Transit Service Planning section is reviewing the Draft EIR and may have additional comments.

Comment noted. The San Francisco Municipal Transportation Agency Transit Service Planning section did not submit comments on the Draft EIR.
INTER-OFFICE MEMORANDUM

DATE: November 7, 2016

TO: Wendy Bloom, Campus Planner
Anita Schenk, Environmental Specialist/Planner, Dudek

FROM: Irina Torrey, Manager, SFPUC Bureau of Environmental Management

SUBJECT: San Francisco State University (SF State) Creative Arts & Holloway Mixed Use Project

The attached table provides SFPUC comments on the SF State Creative Arts & Holloway Mixed Use Project Draft Focused Tiered Environmental Impact Report.

If you require further information or have any questions, please contact Angela Yu, Environmental Project Manager, at (415) 854-3127 or amyu@sfpuc.org. Thank you for the opportunity to provide input.

Attachment: SFPUC Table of Compiled Comments
<table>
<thead>
<tr>
<th>Comment Number</th>
<th>Commenter Name &amp; Affiliation</th>
<th>Document Section Title or Section Number</th>
<th>Page Number and Line or Paragraph Number</th>
<th>Figure Number</th>
<th>Review Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Polly-Planks &amp; Joe Kincaid, WE/EPCD</td>
<td>3.5.5 - Stormwater</td>
<td>3.17, paragraph 1</td>
<td>N/A</td>
<td>Remove reference to LEED cred 20-6.1. This credit is no longer applicable per the new LEED Version 4, which became effective in October 2018. Change “compatible” to “comply with” in the latter portion of this sentence.</td>
</tr>
<tr>
<td>2</td>
<td>Polly-Planks &amp; Joe Kincaid, WE/EPCD</td>
<td>General</td>
<td>General</td>
<td>N/A</td>
<td>Why are the hydrologic impacts of this project not discussed in the DBEF?</td>
</tr>
</tbody>
</table>
| 3              | J Arnt, CDD | N/A | N/A | N/A | The project site is located within an area that is hydraulically served by water mains that are owned, operated, and maintained by PG&E. In the event that these water mains are transferred to SRPUC ownership in the future, all water facilities, including potable, fire-suppression, and non-potable water systems, must conform to the current SRPUC City Distribution Division (CDD) and San Francisco Fire Department (SFFD) standards and procedures. These include, but are not limited to, the following:  
+ SRPUC CDD Protection of Existing Water and AMSS Facilities;  
+ SRPUC Wastewater & Water Standards for Surface Improvement Projects (June 2018);  
+ Rules and Regulations Governing Water Service to Customers;  
+ SRPUC CDD Design Criteria for Potable Water Systems;  
+ Application for Water Supply and Responsibility of Applicants;  
+ San Francisco Fire Code and Reliability;  
+ California Waterworks Standards, California Code of Regulations Title 17 and 22  
+ Auxiliary Water Supply System (AWSS) Distribution Piping;  
+ Any other regulations governing the installation and protection of water facilities not already stated. |
| 4              | J Arnt, CDD | N/A | N/A | N/A | To ensure adequate fire suppression reliability and capacity, the Project Sponsor may be required to include one of more of the following: two sources of water delivery (connections to two separate meter mains), AWSS high pressure distribution piping, AWSS cistern, and/or Portable Water Supply System equipment. |
Response to Comment Letter 3

San Francisco Public Utilities Commission
Irina Torrey
November 7, 2016

3-1 This comment requests that references to Leadership in Energy and Environmental Design (LEED) credit SS 6.1 be removed since the credit is no longer applicable in LEED Version 4. Additionally the comment recommends that “compatible” be changed to “comply.”

References to LEED credit SS 6.1 in the first complete paragraph of Final EIR Chapter 3, Project Description (page 3-17) and in the Tiered Initial Study (Appendix A, page 19), have been removed.

The San Francisco Public Utilities Commission (SFPUC) also recommended that “compatible” be changed to “comply” in the later part of the same sentence to indicate that SF State would comply with the City’s Stormwater Management Requirements and Design Guidelines. This change was not made, given that SF State, as a state agency, does not fall under the jurisdiction of the City or the SFPUC, and is not required to meet the City’s Stormwater Management Requirements and Design Guidelines. However, SF State acknowledges the importance of achieving the design standards included in the City’s guidelines in reducing the effects of new development on the City’s combined sewer system, providing for groundwater recharge and other environmental benefits. Therefore, the Project stormwater management approach would be compatible and consistent with the SFPUC’s requirements, as the Project would implement the stormwater design criteria identified in these guidelines, as described in Final EIR Chapter 3, Project Description (page 3-17).

3-2 This comment asks why hydrological impacts are not discussed in the Draft EIR.

As described in Final EIR Chapter 2, Introduction, the EIR for this Project is tiered to the 2007 CMP EIR. Tiering refers to using the analysis of general matters contained in a broader EIR, such as the CMP EIR, with later EIRs or Negative Declarations on narrower projects, incorporating by reference the general discussions from the broader EIR and concentrating the later EIR or Negative Declaration on the issues specific to the relevant activities/project (14 CCR 15152(a)).

A Tiered Initial Study was prepared and is attached as Appendix A to this Final EIR to identify the issues that were adequately addressed in the 2007 CMP EIR and to identify the issues that would require further analysis. The tiered project-level
evaluation provided in the Tiered Initial Study (Section 4.9 of the Initial Study) addresses the potential impacts of the Project related to hydrology and water quality. The Tiered Initial Study found that there are no new or increased impacts over and above those identified in the 2007 CMP EIR related to hydrology and water quality; therefore, the Final EIR does not include additional analysis of this topic.

3-3 This comment outlines the SFPUC City Distribution Division and San Francisco Fire Department standards and requirements for water mains.

Final EIR Chapter 3, Project Description, Section 3.5.6 (page 3-16), states that any connections with SFPUC mains required for the Project would be consistent with City standards. The comment about Parkmerced water mains and the condition that transfer of ownership of these water mains to SFPUC would require conformance with current standards and practices is noted for the record.

3-4 This comment notes the requirements to ensure adequate fire suppression reliability and capacity.

Final EIR Chapter 3, Project Description, Section 3.5.6 (page 3-16), states that any new connections with SFPUC mains would be consistent with City standards. Additional text has been added to page 3-16 to clarify that this would provide for adequate fire suppression reliability and capacity.
SAN FRANCISCO STATE UNIVERSITY
CREATIVE ARTS & HOLLOWAY MIXED-USE PROJECT

**********

Name: Ralph Chorn
Organization (if any): LPOA
Do you represent this Organization? Yes No
Address:
City, State, Zip:
E-mail: ralph_chorn@yahoo.com Telephone:

Written Comments

Parking - needs to be more parking - especially for peak times or peak events.
Traffic - particularly the 16th & Park Merced. Overlap in construction with Park Merced so concerns about dust, noise, traffic.
Feels there should not necessarily be as much additional housing on campus - the need now may be because of the current economy and soon there will be a recession. Wants to make sure there are mitigations that address those concerns.

Please note: Comments, including personal information, become public information and may be released to interested parties if requested.

Please either leave this sheet at the "comment table" before you leave today or mail, email, or fax to the address below.

(See Reverse for Additional Information)
Written Comment Form

Please note that your address, phone number, e-mail address, or other personal identifying information in your comment, is part of your entire comment, including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Mail comments to:
Wendy Bloom
Director of Campus Planning
Capital Planning, Design & Construction
San Francisco State University
1600 Holloway Avenue
San Francisco, California 94132
wbloom@sfsu.edu (subject line of emails “Creative Arts & Holloway Mixed-Use Project”)

Public Review Ends: November 11, 2016

To ensure that your comments are responded to in writing and included in the Final EIR, San Francisco State University must receive written comments by the close of the public review period (November 11, 2016, no later than 5:00pm).
Response to Comment Letter 4

Lakeside Park Owners Association
Ralph Chern
October 18, 2016

4-I This comment indicates that there should be more parking, especially for peak times or peak events.

Consistent with the 2007 CMP (SF State 2007b), parking in the new student housing/mixed-use building on Holloway Avenue would relocate a portion of the campus parking supply to the perimeter of campus, removing existing parking along Tapia Drive and from elsewhere on campus, such that the Project would result in no net increase in the overall campus parking supply. The 2007 CMP EIR (SF State 2007a), to which this EIR is tiered, concludes that the parking strategy proposed by the 2007 CMP would not have a significant impact because it is consistent with the City’s Transit First policy and is designed to ensure that single-occupant vehicle mode split does not increase and that new single-occupant vehicle trips are not generated.

As discussed in Section 4.5, Transportation (page 4.5-11), since the 2007 CMP EIR was certified, parking deficits in and of themselves have been removed from the CEQA Guidelines and are no longer considered in Appendix G of the CEQA Guidelines as an impact category evaluated in CEQA documents. This is because new parking can encourage automobile use and discourage transit and other alternative forms of transportation. Therefore, parking is not considered in the standards of significance or the impact analysis for the Project in Final EIR Section 4.5, Transportation.

The 2007 CMP objectives include reducing parking demand through transportation demand management (TDM) measures that serve to reduce drive-alone vehicles (SF State 2007b). The absence of available parking spaces, the available alternatives to vehicular travel (transit, bicycling, and walking), and the dense pattern of urban development could induce many drivers to seek other modes of travel or change their overall travel behavior. The success of SF State’s TDM measures is demonstrated by the overall reduction of campus-related vehicle trips in 2016, as compared to the 2007 CMP EIR baseline (see Final EIR Section 4.5, Transportation, page 4.5-18 for additional information).

The addition of student housing and neighborhood retail services would reduce the need for student automobile use, which would reduce parking demand and support SF State’s goal to minimize drive-alone auto trips to reduce traffic congestion and
greenhouse gas emissions. The Creative Arts replacement building would not result in an increase in student enrollment. At most, four additional staff members would be hired to support operations of the new building. Therefore, there would not be a substantial increase in parking demand due to the Creative Arts replacement building.

Most weekday events at the concert hall would not begin until 7:30 p.m. or 8:00 p.m. During this time, parking demand on campus is lower, as evidenced by a reduced number of vehicles entering the cordon study area and an increased number of vehicles leaving (Nelson Nygaard 2016). Event attendees would be able to use parking spaces that are unoccupied during the evening, including new parking in the student housing/mixed-use building. Overall, the Project would not result in secondary physical effects on the environment, such as increased traffic congestion, due to the removal of parking on the Project site. Final EIR Section 4.5, Transportation (page 4.5-11), has been revised to describe the Project’s parking demand based on the above information.

This comment identifies concern with traffic, particularly at 19th Avenue near Parkmerced.

As discussed in Final EIR Chapter 2, Introduction, Section 2.1 (page 2-1), this EIR is tiered to the 2007 CMP EIR. Transportation impacts and mitigation measures for the Project are discussed in Final EIR Section 4.5, Transportation, Section 4.5.2. As indicated in Project Impact TRA-1 (page 4.5-23), since the adoption of the 2007 CMP, the campus has achieved the no-net-increase in vehicle trips objective identified in the CMP (CMP Impact TRA-1). To date, a net reduction of PM peak-hour vehicle trips has been achieved since 2007. SF State adopted a TDM Plan and has conducted an online transportation survey and cordon count at least every 3 years beginning in April 2008 as part of CMP EIR Mitigation TRA-1. Based on the 2016 cordon counts, the number of peak-hour trips, automobile trips per day, and respondents driving alone has decreased over 2008 conditions. Given that, the intersection improvements identified in CMP EIR Mitigation TRA-1 have not been required.

On typical, non-event days, the Project would contribute to the reduction of vehicle trips due to the provision of on-campus housing for students who would otherwise be living off campus. On event days (up to 80 per year or approximately 7 per month), the Project would remain within the Adjusted CMP Trip Envelope, which means the Project trips have already been accounted for and mitigated in the CMP EIR traffic analysis (SF State 2007a). On most days during the year, the Project would result in many fewer, if any, new vehicle trips to SF State’s campus. Additionally, with Project implementation, campus-wide trip generation would remain below the CMP
EIR base year, and the impact would be less than significant. As described in Project Impact TRA-1, there are no new or increased impacts compared to the CMP EIR as a result of vehicle trips generated by the Project.

4-3 This comment indicates concern about dust, noise, and traffic associated with the overlap of Project construction with the Parkmerced project.

As described in Final EIR Chapter 3, Project Description, Section 3.6, construction plans and specifications would incorporate stipulations regarding standard California State University requirements and acceptable construction practices, including grading and demolition, safety measures, vehicle operation and maintenance, excavation stability, erosion control, drainage alteration, groundwater disposal, traffic circulation, public safety, dust control, and noise.

In particular, in accordance with CMP EIR Mitigation HAZ-5A, a construction traffic control plan would be prepared by SF State and/or the construction contractors to address potential lane closures, construction vehicle access routes and parking, hours of construction, and other traffic concerns. The traffic control plan would comply with the City’s Encroachment Permit or Major Encroachment Permit requirements, if applicable. Given that Phase 1 of the Parkmerced project would be under construction at the same time as the Project, SF State’s traffic control plan would be coordinated with the traffic control plan for that project to minimize temporary impacts on vicinity roadways.

Final EIR Section 4.2, Air Quality (Project Impact AIR-4B, page 4.2-28) provides a cumulative analysis of Project construction. The only known active project in the Project vicinity that could contribute to cumulative, localized construction emissions would be Phase 1 of the Parkmerced project, with the nearest development site (300 Arballo) approximately 500 feet from the Block 1 portion of the Project site. Accumulation of cumulative particulate matter (PM$_{10}$ and PM$_{2.5}$) (dust) emissions would be minimized based on the substantial distance between the Project site and this Parkmerced development site, and because all projects in the Bay Area Air Quality Management District (BAAQMD) jurisdiction are subject to BAAQMD construction best management practices, which set forth general and specific emissions reduction requirements for all construction sites in the BAAQMD. These best management practices are included in CMP EIR Mitigation AIR-1, which will be implemented with the Project.

As this EIR is tiered to the 2007 CMP EIR, a Tiered Initial Study was prepared and is attached as Appendix A to this Final EIR to identify the issues that were adequately
addressed in the 2007 CMP EIR and to identify the issues that would require further analysis. The tiered project-level evaluation provided in the Tiered Initial Study (Section 4.12, pages 58–59) addressed the potential impacts of the Project related to construction noise. The Tiered Initial Study found that there would be no new or increased impacts over and above those identified in the 2007 CMP EIR related to construction noise. Implementation of CMP EIR Mitigation NOIS-1 with the Project would control Project construction noise at sensitive receptor locations surrounding the Project site to the extent practicable and feasible, and would reduce the potential impact at most locations to less than significant. Similarly, Parkmerced construction activities would be required to implement mitigation measures to reduce noise levels during construction, as documented in the Parkmerced EIR mitigation measures M-NO-1a, M-NO-1b, and M-NO-2 (CCSF 2010). See Appendix A, Section 4.12, pages 58–59 for additional information about the construction noise analysis for the Project.

4-4 This comment indicates that there is not a need for additional housing on campus.

As stated in Final EIR Chapter 3, Project Description, Section 3.3.1 (page 3-2), the 2007 CMP addresses all aspects of future physical development and land use on the campus to accommodate the enrollment ceiling of 25,000 full-time-equivalent students. To accommodate the projected growth in enrollment and academic activities, the adopted CMP accommodates a building program that envisions development of 0.9 million gross square feet of new and replacement non-residential building space on campus, and development or conversion of approximately 1,198 additional units of housing on campus for faculty, staff, and students.

Over the last decade, SF State has been admitting increasingly more first-time freshmen, many from outside of the Bay Area, who need housing. In addition, there are a large number of junior transfer students who require housing. As rents have soared in the area, the need for both groups has become even greater, and providing housing for this wider population is important. In addition, upper-division students require a different housing typology than entering freshmen. Holloway Block 6 is slated for upper-division housing, and SF State anticipates building residence halls for freshmen and sophomores in the future.

One of the goals of the 2007 CMP was to create more of a community and less of a transient, commuter campus. Housing for students, faculty, and staff is key to creating community, with more people around during all hours of the day. Currently, the freshman 4-year graduation rate is at 18%, which is very low. Building a supportive community would help improve graduation rates. Overall, campus housing has many benefits. As part of creating community, it contributes to student
retention and graduation rates; it increases the supply of affordable housing in a fiercely competitive market; and by reducing commute trips, it reduces greenhouse gas emissions. See also Response to Comment 7-2 for additional information about the need for housing.

4-5 This comment indicates that mitigation should be identified to address concerns raised in Comments 4-1 through 4-3.

See Response to Comments above for reference to CMP EIR mitigation measures that apply to the Project related to air quality, hazards, noise, and traffic. See also Final EIR Chapter 4, Introduction to the Analysis (page 4.0-1), for a description of how impacts are analyzed and how the need for project-specific mitigation measures above and beyond those identified in the CMP EIR was determined.

4-6 This comment asks whether SF State has looked into online learning as a way to increase student population without increasing facilities and expenses.

Online learning at SF State has grown from 35 class sections and 1,885 student enrollments in academic year 2005–2006 to approximately 412 class sections and 25,300 student enrollments in academic year 2016–2017. In academic year 2016–2017, approximately 2–3% of the class sections and approximately 11% of the student enrollments are in fully online classes. This represents more than 1,000% increase in the past decade. The use of fully online classes has grown in selected areas that do not require a physical presence for effective student learning to take place.

Even though the number of class sections and student enrollments in online learning has grown considerably over the past decade, SF State has no fully online degree programs, and remains a state and regionally focused institution with a primarily classroom-based instructional program. There are many hybrid and HyFlex classes in addition to fully online classes, and almost all classes (approximately 75%) use online technologies to enhance or complement their classroom instruction. There are no current strategic efforts to build a substantial number of online degree programs, which means that the classroom would remain the dominant place for instruction in SF State’s degree programs for the foreseeable future.

Programs such as those in Creative Arts (including Department of Broadcast & Electronic Communication Arts) may find some value in delivering carefully chosen elements of their curriculum online, but due to the nature of their instructional programs, the physically present, hands-on learning approach supported by a traditional classroom/lab environment on campus remains a fundamental requirement for students to succeed in those academic programs.
November 9, 2016

Wendy Bloom
Director of Campus Planning
Planning and Design
San Francisco State University
1600 Holloway Avenue, San Francisco, California, 94132

Re: Comments Related to the Focused Tiered Draft Environmental Impact Report (Draft EIR) for the Creative Arts & Holloway Mixed Use Project

Dear Ms. Bloom,

Thank you for the opportunity to comment on the Focused Tiered Draft Environmental Impact Report (the "Draft EIR") for the Creative Arts & Holloway Mixed Use Project (the "Project"). The Trustees of San Francisco State University issued the Draft EIR for public review and comment and have established a 45-day public review period from September 27, 2016 to November 11, 2016. This letter provides comments on the Draft EIR.

As you know, in July 2011, Parkmerced received approval by the City and County of San Francisco (the "City") of a long-term (20 to 30 year) mixed-use development project to comprehensively replan and redesign Parkmerced, which project, upon implementation, would construct additional multi-family residential structures and open space areas, demolish existing apartments, provide a neighborhood core with new commercial and retail services, reconfigure the street network and public realm, improve and enhance the open space amenities, modify and extend existing neighborhood transit facilities, and improve utilities within Parkmerced Property (the "Parkmerced Project").

During the entitlement process for the Parkmerced Project, we worked collaboratively with SFSU to ensure that the street and other public space improvements located on the boundaries between Parkmerced and SFSU (including the portions of the Parkmerced development that were formerly sold to SFSU) were thoughtfully designed and in keeping with the City's Better Streets Plan. As noted in the Draft EIR, the streets surrounding SFSU are under the jurisdiction of the City. These discussions between multiple stakeholders (Including SFSU, the SFMTA, DPW, and San Francisco Planning Department)
between 2006 and 2011 resulted in the Parkmerced Design Standards and Guidelines (the “DS&G”) and Transportation Plan, which are the foundational master planning documents for the Parkmerced Project. Based on this collaboration, Parkmerced and the City were hopeful that SFSU would in good faith consent to the construction of the improvements shown in the DS&G and the Transportation Plan to the streets bounding Parkmerced that are shared by Parkmerced and SFSU, including Vidal Drive and Font Boulevard.

Since 2011, the same collaboration in implementing the street system envisioned in the DS&G and Transportation Plan has not continued. SFSU’s rejection of the intersection planned at Vidal Drive and Lake Merced Boulevard is particularly troubling. Increasing the permeability of Parkmerced by expanding the number of intersections connecting Parkmerced to the surrounding street network was one of the fundamental components of the DS&G and the Transportation Plan, and is one of the City’s key goals in implementing the Parkmerced Project.

Parkmerced is now concerned that certain aspects of the Project as described in the SFSU’s Draft EIR conflict with the DS&G and the Transportation Plan, and would further impede construction of the street improvements as shown in those documents. Page 3 of the Draft EIR states that the Project’s design “guidelines were prepared for consistency, where relevant, to the Parkmerced Design Standards and Guidelines (SOM 2014).” We disagree with this statement as it relates to one aspect of the Project in particular:

Per Section 3.5.5 of the Draft EIR, the Project envisions Varela Avenue as a shared street that “would include eliminating parking on Varela Avenue, a strategy to modify and reduce curbs so that ease of movement is promoted across Varela Avenue, and pavers that strengthen the pedestrian the pedestrian connections as well as provide a safe street crossing.” As proposed, a Woonerf street conflicts with the proposed improvements for Varela Avenue in the DS&G (See Section D2.18), which anticipate the street remaining open to vehicular traffic. Additionally, Varela Avenue would need to be designed to accommodate SFMTA bus service, specifically the 29-Sunset, per the Parkmerced Transportation Plan (See Figure 11). Given that both SFSU and Parkmerced own frontage along Varela Avenue, we are hopeful that SFSU will coordinate the design of Varela Avenue with Parkmerced and keep the street design consistent with that shown in the DS&G.

Increasing the permeability of Parkmerced to the surrounding street system is one of the key components of the DS&G; unfortunately, closing Varela would decrease the permeability of Parkmerced and would channel traffic onto other intersections.

Section 4.5-18 of the Draft EIR indicates that “the CMP EIR Project and cumulative intersection level of service analysis was not updated for this EIR” because “the PM peak-hour trips from the campus have declined substantially since 2007/2008 due to an effective TOD program and changing demographics and population.” We request that SFSU include a complete level of service analysis for the intersections bounding Parkmerced and SFSU, in
order to provide evidence that the closure of Varela Avenue to traffic would not result in decreased level of service at adjacent intersections. The Draft EIR provides no evidence related to the effect of closing Varela on level of service. Whether the total number of peak hour trips has been reduced since 2007/2008 is not relevant to the effects of the distribution of those trips.

In addition, Parkmerced very respectfully requests that any anticipated future improvements to Holloway Drive, Font Boulevard, or any other streets bordering Parkmerced and SFSU be adequately studied in the responses to the Draft EIR to understand all traffic, transit, bicycle, and pedestrian circulation impacts to the City's streets and the greater neighborhood. In particular, future street improvements along Font Boulevard between Lake Merced Boulevard and Arballo/Tapia Drive, and Arballo Drive between Font Boulevard and Vidal Drive should be coordinated with Parkmerced and the City to ensure that proposed improvements are consistent with the DS&G and applicable traffic mitigation measures for Font Boulevard at Lake Merced Boulevard. We remain concerned that SFSU's plans to Holloway Drive and Font Boulevard are not analyzed in the future cumulative scenario for the Project in the Draft EIR, given that these improvements are reasonably foreseeable. We further request that the Draft EIR include an analysis of level of service and other transportation effects to Font Boulevard and Holloway Drive that would result from the conceptual plans that SFSU has shared with Parkmerced, the City, and other stakeholders but that are not shown in the Draft EIR. The Draft EIR risks improperly segmenting the analysis of these transportation improvements, to the extent that SFSU has already created conceptual plans for these roadway improvements but has not included them in its transportation analysis in the Draft EIR.

We look forward to working with SFSU and are hopeful that these comments will be thoroughly addressed in the responses to comments in the final Project EIR.

Sincerely,

Bert Polacci
Director, Government Relations
Maximus Real Estate Partners

Cc: Les Wong, President, San Francisco State University
    Jason Porth, San Francisco State University
    Seth Mallen, Maximus Real Estate Partners
INTENTIONALLY LEFT BLANK
Response to Comment Letter 5

Parkmerced, Maximus Real Estate Partners
Bert Polacci
November 9, 2016

5-1 This comment expresses concern about the Project’s consistency with the street system envisioned in the Parkmerced Design Standards and Guidelines and Transportation Plan relating to Varela Avenue.

It is SF State’s intention to be compatible with the Parkmerced Design Standards and Guidelines and Transportation Plan, and to coordinate with the City and Parkmerced on proposed changes to the public right-of-way in the southern portion of the campus adjacent to Parkmerced. SF State is not pursuing closure of Varela Avenue as part of this Project and has removed references to its closure. Final EIR Chapter 3, Project Description (page 3-14), and Section 4.5, Transportation (page 4.5-28), have been revised to eliminate reference to closure of Varela Avenue to vehicle travel.

5-2 This comment indicates that a complete level of service analysis for the intersections bounding Parkmerced and SF State should be conducted to assess the effect of closing Varela Avenue.

As indicated in Response to Comment 5-1, Varela Avenue would not be closed to vehicle travel with the Project. Therefore, a complete level of service analysis of these intersections is not warranted.

5-3 The comment indicates that SF State’s future plans for Holloway Avenue and Font Boulevard should be analyzed in the future cumulative scenario for the Project. Specifically, the comment indicates that level of service and other transportation effects of future plans for Holloway Avenue and Font Boulevard should be studied in the EIR or there may be a risk of improper segmentation.

Early concept plans for the Holloway Avenue/Font Boulevard corridor through the campus that SF State shared with Parkmerced, the City, and other stakeholders in April and May 2016 were conceptual and are not definitive at this time. SF State is not currently pursuing the design of corridor improvements on Holloway Avenue or Font Boulevard, and there is no existing or pending funding for these improvements. These improvements could include bicycle and pedestrian facilities and would not include a reduction in the number of vehicle lanes or roadway capacity. However, without a proposed design concept, the improvements and
associated effects on the transportation system are too speculative to consider as part of a detailed level of service analysis or other transportation analysis. The next Master Plan update process may develop and incorporate conceptual or schematic plans for the Holloway Avenue/Font Boulevard corridor through the campus, and the CEQA document for that effort would evaluate the effects of such improvements on the adjacent transportation system.

As indicated in Response to Comment 5-1, it is SF State’s intention to be compatible with the Parkmerced Design Standards and Guidelines and Transportation Plan. Toward that end, SF State will coordinate with the City and Parkmerced on future proposed changes to the public right-of-way in the southern portion of the campus adjacent to Parkmerced.
Anais Schenk

From: Wendy Bloom <wbloom@sfsu.edu>
Sent: Thursday, November 10, 2016 12:01 PM
To: Linda Jo Morton
Cc: Ann Savinetti, Anais Schenk, Nicholas Holmes
Subject: RE:CEQA

Linda,

Thanks very much for your comments on the Draft EIR. We'll respond in the Final EIR.

Wendy

From: Linda Jo Morton
Sent: Thursday, November 10, 2016 12:01 PM
To: Wendy Bloom <wbloom@sfsu.edu>
Subject: CEQA

Hi Wendy,

I was reading over the Housing portion and just wanted to show my support for the following:

3.5.6 Water - I hope someone strongly advocates for installing the recycled water infrastructure now. When the trench is open for the potable water and the additional purple piping, it much cheaper to install now than after the building is built.

Storm water – Keep as much storm water on site as possible and having a plate palette for Bioswales.

Solid waste – Will there be an area for Recology to pick up waste from the different blocks or will the housing staff have to collect waste separately and transport it to another location on campus?

Landscape – Block 1 has a Sequoia at the corner that I think is worth saving. Additionally, the language regarding tree replacement seems weak “replace some trees”, what is the actual quantity of trees being planted. As a rule of thumb I like to plant 3 trees for every 1 that was removed space allowing of course.

Thanks for your time,
Response to Comment Letter 6

SF State, University Property Management
Linda Jo Morton
November 10, 2016

6-1 This comment provides support for installing recycled water infrastructure as part of the Project.

As discussed in Final EIR Chapter 3, Project Description, Section 3.5.6 (page 3-16), the Project would aim to include installation of recycled water infrastructure. It is acknowledged that installation of “purple” piping during initial project construction would be more cost effective than retrofitting the building in the future.

6-2 This comment indicates that SF State should keep as much stormwater on site as possible.

As discussed in Final EIR Chapter 3, Project Description, Section 3.5.6 (page 3-16), the Project would implement a stormwater management approach that reduces the existing stormwater runoff flow rate and volume by 25% for a 2-year, 24-hour design storm. The actual design of the stormwater management system would be developed as the design process proceeds. By implementing these design criteria, the Project would surpass the requirements of the 2007 Campus Master Plan, calling for no net increase in storm flow discharge from the campus to the combined sewer system.

6-3 This comment asks detailed operational questions about collection and transport of waste from the Project.

As discussed in Final EIR Chapter 3, Project Description, Section 3.5.6 (page 3-17), all proposed buildings would have trash, composting, and recycling services. Standard campus practices for collection and transport of waste would be implemented with the Project.

6-4 This comment asks for more definitive information about tree replacement with the Project.

The Board of Trustees of the California State University will consider approval of schematic designs at the same time as they consider certification of the EIR for this Project. Due to this timeline, detailed design and landscaping plans are not yet available. Therefore, specific information about tree removal and replacement is not currently available. As indicated in Final EIR Chapter 3, Project Description (page 3-18), some removed trees on SF State property would be replaced. Replacement
would depend on the availability of planting space for trees on the Project site, given building, pathway, and stormwater management system coverage on the site. SF State would comply with the permitting requirements of the City’s tree protection legislation for any trees removed in the City’s right-of-way.
Anais Schenk

From: Wendy Bloom <wbloom@sfsu.edu>
Sent: Friday, November 11, 2016 4:30 PM
To: Mani Drayton
Cc: Ann Sasevenco; Anaïs Schenk; Nicholas Holmes
Subject: RE: SFSU Draft EIR: Holloway Ave Construction & Expansion

Mani,

Thank you for your comments on the Draft EIR. You will receive a response in the Final EIR.

Best,

Wendy

From: Mani Drayton [mailto:maniiwdrayton@yahoo.com]
Sent: Friday, November 11, 2016 11:29 AM
To: Wendy Bloom <wbloom@sfsu.edu>
Subject: SFSU Draft EIR: Holloway Ave Construction & Expansion

Hello San Francisco State and CSU Board of Trustees,

Thank you for reading. This is a very important issue that if it goes forward will NOT be reversible, and may create long-term harm for students, our region, our common's, local residents, and more.

All comments stated are regard SFSU Draft EIR for the Holloway housing and concert hall expansion. The below assertions are based on SFSU and the CSU in conjunction is not living up to its mission statement; furthermore, is not being driven by such a robust and powerfully stated mission for a better California.

SF State Master Plan
http://code.sfsu.edu/plan

**SFSU Will NOT Achieve its Stated Goals Based ON THE CURRENT PLAN**

- SFSU and CSU system is not focused on high quality affordable education, which means its student population must work to eat, have shelter, pay off student loans, etc. The CSU's mission, quality affordable education meant for Californians is not being achieved. SFSU (CSU Board of Trustees) are creating a less and less affordable higher education system, and there is NO long-term strategy to REVERSE this 30 year trend creating what can be considered as a modern day indentured servitude for its student population. With this being said, only those students that come from families that have the financial means or those that take on excessive amounts of debt will be spending their time enjoying this model urban university concept, them and them alone. SF State will literally be create a two tier student body of have and have nots.
PAYING 3 TIMES MORE - Chart: The Cost of Tuition at UC and CSU Over the Years, Adjusted for Inflation


You have a serious issue that is NOT isolated to one campus, student hunger, homelessness, and more:
http://www.pbs.org/newshour/bb/college-students-difficult-test-may-basic-survival/

There was a time not so long ago when a student attending SFSU or other CSUs could pay off their current student debt and live independently by working a minimum wage part-time job during the school year, and work full-time during the summer, this way of college life is gone but it doesn’t have to be. At this time, what should take precedence is a re-commitment by SFSU, CSU Board of Trustees, and Sacramento to achieve this stated multi-generational California goal, and SFSU should lead the way.

SFSU IS MEANT TO HELP WHO

- SFSU was established to serve San Francisco residents and the 5 other local counties (*Alameda, Contra Costa, Marin, San Francisco, San Mateo & *Santa Clara counties). It is my assertion that it is inappropriate of SF State to be actively seeking and recruiting large numbers of students and staff outside its historic boundaries. SFSU is a public institution, NOT private or exclusive, instead an important public common, and it is meant to meet the needs of the local community.

Sourced from SFSU’s master plan, pg 10
Historically, the majority of new SF State students already lived in the Bay Area region at the time of their enrollment at SF State; however, this trend is shifting with increasingly more students relocating to the Bay Area from other areas to attend SF State. Therefore, this EIR assumes that about 50 percent of all the additional students (or 2,760 students) would be “new” to the study area, that would relocate in order to study at SF State. This EIR also assumes that all of the faculty will be new to the study area, as faculty is likely to be recruited
from outside the area. Although staff positions are typically filled by persons already living in the Bay Area, conservatively this EIR assumes that the additional staff will also be new to the study area. Based on these assumptions approximately 3,470 SF State affilites will be new to the study area and therefore will be seeking housing, as shown in Table 4.10-5, below.

- SF State and CSU system seemed to have abandoned their responsibility without having a significant multi year discussion with all counties that are supposed to comprise SFSU student body. SF State seems to have unilaterally pursued a DRASTICALLY different policy direction, which they should had to receive full acceptance for from the historic 6 counties that comprise SFSU in order to make ANY change.

**DOES SFSU NEED ANY MORE HOUSING**

- Parkmerced proposed 300% increase in housing (8,900 units). Is additional SFSU housing essential with over 6,500 units of NEW housing is slated to be built (population growth, from 10,000 to 30,000) in Parkmerced starting before January. Furthermore, Stonestown ownership is looking to build a large apartment complex on its property. Huge amounts of housing straddling both sides of SF State main campus will be added over the next 20-30+ year period just from Parkmerced and potentially Stonestown alone.

http://www.som.com/projects/parkmerced_vision_plan

- If SFSU focused on the historic 6 counties as it was established to for (75-90%) local residents to build a healthier Bay Area with that being said, will SF State need any additional housing. Important question for TODAY, does SFSU have enough students from the aforementioned 6 Bay Area counties to absorb its CURRENT housing stock, plus the proposed Holloway 550 unit (not bed) apartment style student housing with 75-90% local students? A study should be conducted on the long-term ability of the region being able to provide enough students to SFSU to achieve its student housing ambitions, creating a new master plan. Hence, SFSU should be discouraged from eroding our commons any further, and focus on VERY affordable higher education for San Franciscans and the other 5 counties residents.

**Student Enrollment Data:**

<table>
<thead>
<tr>
<th></th>
<th>2006</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>6 Bay Area Counties*</td>
<td>3520</td>
<td>3748</td>
</tr>
<tr>
<td></td>
<td>56%</td>
<td>57%</td>
</tr>
<tr>
<td>All other</td>
<td>2820</td>
<td>2822</td>
</tr>
<tr>
<td></td>
<td>44%</td>
<td>43%</td>
</tr>
<tr>
<td>All Under-graduate First-time Freshmen &amp; Transfers</td>
<td>6340</td>
<td>6570</td>
</tr>
<tr>
<td></td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>* SF, San Mateo, Santa Clara, Marin, Contra Costa and Alameda</td>
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<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Fall ’06</th>
<th>Fall ’06</th>
<th>Fall ’16</th>
</tr>
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<tr>
<td>Student headcount enrollment</td>
<td>27,420</td>
<td>29,628</td>
<td>29,045</td>
</tr>
<tr>
<td>Full-time equivalent student (FTES) enrollment</td>
<td>20,258</td>
<td>23,953</td>
<td>24,108</td>
</tr>
</tbody>
</table>
SFSU Student Enrollment for FALL YEARS: 1996/27,420 | 2006/29,628 | 2016/29,045
official data from SFSU Campus Planning

With the purchase of the once called Stonestown Apartment Complex and a portion of Parkmerced, SF State has add in roughly the past 10 years over 800 units of housing. As one can see, over the past 20 years, SFSU student housing has increased tremendously but its population has dropped almost 600 students. This is a clear indication that fewer local students are attending the University, and far MORE are from other places are being admitted.

The Holloway redevelopment project seem to be more about the increased financials and revenue generated on the backs of students coming from places further than the designated 6 counties, other parts of California, out of state, and international students, than it has anything to do with helping fill the serious need for local SFSU students to have housing as what is repeatedly stated, those that live a ½ away.
Source SF Chronicle

RECOMMITE TO SFSU STUDENTS + MISSION

- What guarantee does SFSU’s leadership have to re-enforcing that the vast majority of all students will be coming from the 6 counties.

SFSU must guarantee that 75-90% of current and new housing will ONLY be for those that are residents coming from their mission of serving the 6 counties, if not, then they are pursuing a clear eroding of this California common at the expense of Bay Area students and taxpayers. As mentioned, SFSU is not a private institution, which means it is suppose to, if not mandated to, be serving San Francisco and the other aforementioned 5 local counties. SF State funding is based, especially construction, on the California taxpayer for Californians. Pursuing such a harmful policy agenda may create a backlash. SF State is taking ever more and more students outside of the major designation of San Francisco and the other historic 5 counties, in which means it is NOT serving the region. Furthermore, SFSU should today, from its existing housing stock, create a portion of student emergency housing, something that will help those in greatest need with services attached to help transition them into regular (on or off campus) housing.

- SF State already has a Creative Arts Building, so does it need another 600 seat auditorium when the student population hasn’t changed in any dramatic way. Is this more a monument to sell people on coming to the University. How is this project really needed over reducing student learning cost, creating long-term affordable quality education. The moneys for this project should be reinvested into the students by reducing any burden of debt.

SFSU MAJOR DISCONNECT WITH THE COMMUNITY

- SFSU sad historical Ohlone desecration, potentially 15,000 Ohlone remains were paved over in building the current SFSU campus. A full reconciliation must be addressed based in equality, fully amicable resolution between the University and the Ohlone people should be achieved, hence living true values expressed in SFSU’s mission statement.

*Attending SF State is more than an education -- it’s an experience, and true preparation for living a life of principle and value.
http://puboff.sfsu.edu/makehappen
- M MUNI line reconfiguration and discriminatory Ingleside stoppage, SFMTA (MUNI), SFSU, Parkmerced, and Stonestown are all focused on having the MUNI M line go underground from West Portal all the way to Parkmerced. Parkmerced will be its final destination, effectively stopping all service to the Ingleside district. The Ingleside district is COMPLETELY against such a discriminatory practice, and SFSU should not be pursuing such a project. SF State needs to publicly and privately change their policy, and encourage in every way possible MUNI to have the M line continue servicing those to be discriminated against all the way to Balboa Station, as it currently does. https://www.sfmta.com/about-sfmta/blog/subway-sfsu-our-plan-take-m-line-down-under

- Centralized Commission should be formed (20-40 yrs of construction) Since this area has been designated for 20-40 years of redevelopment, all members of the community old and new should be well informed about all aspects of construction taking place in the area and how it’s not only projected to impact but is impacting. As an example but not limited to, a centralized commission should be created so all information related to the area’s building and various developers is aggregated and easily known. Information gathering on start and end construction dates, all current construction locations, current air, water, and soil quality. Legally removing of trees. Trees are not ornaments; we need them! Trees are one of the most essential ways our air gets filtered, and oxygen is created. All findings of Chlorine remains must be properly addressed. In addition, noise level testing. Furthermore, a place one can register a complaint. SF State should be with other stakeholders actively working to make this a reality and in doing so, showing it is a valuable member of the community.

- SFSU POOR outreach on Draft EIR The vast majority of people in the surrounding community (neighborhoods), current SF State students, and alumni are utterly unaware that the Holloway mixed use project and concert hall is to be constructed, let alone by fall 2017. Hence, very few participants came to the on campus Draft EIR held on Oct 18, 16. During the time I was there only a handful of people from the public was there, however, based on the populations mentioned or just the surrounding neighborhoods, there should have been hundreds. Let’s be clear, this is an incredibly large project taking up MULTIPLE BLOCKS, but only a small number of people of the community were there. It’s not likely that there is only a few individuals that care about such dramatic change that is slated to begin in less than 12 months, and this is their final opportunity to state their fervent concerns. Furthermore, the room it was held in probably couldn’t comfortably hold a capacity above 50. Hence, I haven’t met one person from any of these populations that are knowledgeable of any construction, and I have asked MANY DOZENS of people. This level of engagement should be concerning to all that care about a healthy community. This process needs to be fixed and redone before this project is accepted by the CSU.

- This project will add greater greenhouse gases, damaging neurotoxins, like but not limited to asbestos and lead will be in the air. Furthermore, it will add toxic carbon to our atmosphere, and we have to seriously start thinking about our choices in a long term way, what impacts are we creating today for today and future generations. The selfish attitude of now never worked, and is dangerous for today’s world. Furthermore, green building in it of itself can’t fix this. We must question and reassess our collective thinking.

http://copol2.mail-en#whatcop/post/164

Living Warmer: How 2 Degrees Will Change Earth
SF State Creative Arts & Holloway Mixed-Use Project
March 2017

7.8 Cont.

7-9

SFSU Holloway Housing and Concert Hall Development Should Only go Forward

This proposed project should go forward only if ALL communities stated feel the above issues have been achieved satisfactorily. Furthermore, SFSU MUST guarantee that all current and future student housing is and will be occupied 70+% from students coming from the historic 6 counties. In addition, this new site and all future sites of housing is affordable based on students family economics, sliding scale. Further, SF State should designate five to ten percent of all of its student housing as emergency student housing with proper services as spoken about prior. As a final piece, a study must be conducted proving that it is probable that over the next 30+ years this region will be able to provide enough students to SFSU to achieve this NEW above stated master plan, reinvesting and a re-committing, then making it economically viable to allow housing be built along Holloway Av.

In closing, if this project is allowed to go through as currently devised by the CSU Board of Trustees, SF State’s Master Plan is in direct opposition to the 6 counties and its Mission Statement, in which this should NEVER happen! VERY seriously, if this project goes forward it will be very difficult, if not impossible, for SFSU to live up to what is a 6 county pact with the University, creating proud QUALITY AFFORDABLE higher education for such students coming from those counties, which means it might take up to 50 years for SF State to achieve 75+% throughout the student body, counting in its student housing. Whether realizing it or not, the University is actively DESTROYING this pact, and the Master Plan’s 50% coming from outside of the Bay Area (local) goal might GROW HIGHER, to 60% or 70% all because of this proposed project. Due to this, until ALL of the above is fully addressed, SFSU and CSU Board of Trustees should indefinitely hold off on such project.

I thank San Francisco State leadership and CSU Board of Trustees who care about the gravity shared regarding the above statement, and is looking at this through a thoughtful, deliberate, and genuine focus on reinforcing a healthier young adult (8 youth) population and beyond for the Bay Area. SF State as an essential common, not a private institution unconnected to the community for it resides, means all current and future decisions for the University must be based on strengthening just that, our local common for the local populous.

Sincere regards,

Mani Drayton
Response to Comment Letter 7

Mani Drayton
November 11, 2016

7-1 This comment indicates that SF State will not achieve its stated goals with the Project, and further indicates that the mission of California State University to provide an affordable, quality education for Californians is not being achieved.

For information purposes, SF State's Mission Statement can be found at http://senate.sfsu.edu/policy/revision-mission-statement-policy. The policy is as follows:

From the heart of a diverse community, San Francisco State University honors roots, stimulates intellectual and personal development, promotes equity, and inspires the courage to lead, create, and innovate.

SF State is a major public urban university, situated in one of the world's great cities. Building on a century-long history of commitment to quality teaching and broad access to undergraduate and graduate education, the University offers comprehensive, rigorous, and integrated academic programs that require students to engage in open-minded inquiry and reflection. SF State encourages its students, faculty, and staff to engage fully with the community and develop and share knowledge.

Inspired by the diversity of our community that includes many first-generation college students, and the courage of an academic community that strives to break down traditional boundaries, SF State equips its students to meet the challenges of the 21st century. With the unwavering commitment to social justice that is central to the work of the university, SF State prepares its students to become productive, ethical, active citizens with a global perspective.

An EIR is an informational document that is required to identify the potentially significant impacts of a project on the environment. According to the CEQA Guidelines, economic or social effects of a project are not treated as significant effects on the environment (14 CCR Section 15131) in this EIR.

7-2 This comment indicates that it is inappropriate for SF State to actively seek and recruit large numbers of students and staff outside its historic boundaries.
As indicated in Final EIR Chapter 3, Project Description (pages 3-3 and 3-4), the adopted 2007 Campus Master Plan (CMP) accommodates an enrollment increase to 25,000 full-time-equivalent (FTE) students. The campus is currently approaching this FTE ceiling and additional FTE students beyond 25,000 cannot be added under the current 2007 CMP and related approvals. The change in total campus population (also called headcount) has been flat since the 2007 CMP EIR base year, given that the number of full-time students has been increasing and the number of part-time students has been declining. The Project would not result in substantial increases in SF State campus population over existing 2015–2016 levels. The Project would not substantially increase SF State's population. General information about SF State’s local admission and service areas is provided below. The need for new housing is also discussed.

**Admission Area.** The 23 CSU campuses are distributed across the state to provide broad access to higher education. The larger, established campuses have defined local admissions areas to give priority to their communities, but all campuses serve the entire statewide population.

The local admission area describes a geographic area within which prospective students are given preferential admission. The service area is the geographic area for which each campus is responsible for providing school-college relations and outreach on behalf of the entire CSU system (CSU 2013). The service area does not delimit the right or opportunity of any campus to communicate to high schools and community colleges because all campuses are statewide (CSU 2010). Moreover, the delineation of service area is not a basis for defining or restricting the admission of qualified students (CSU 2010).

SF State’s campus-specific outreach and recruitment efforts are focused primarily on the six Bay Area counties that comprise its local admissions area, including Alameda, Contra Costa, Marin, San Francisco, San Mateo, and Santa Clara Counties. In particular, San Francisco and San Mateo Counties are the primary focus. The top three feeder public and private high schools in 2015 were located in San Francisco. City College of San Francisco continues to be SF State’s top community college feeder, followed by Skyline College (San Mateo), Diablo Valley College (Contra Costa), De Anza Community College (Santa Clara), and College of San Mateo (San Mateo) (SF State 2016). Over the past decade, the majority of the combined number of freshmen and transfer students admitted to SF State has been residents of the six Bay Area counties.
To strengthen the pipeline of first-time freshmen and upper division transfer students coming from the City to San Francisco State, SF State has partnered with the local community and other local educational institutions. One such effort is Bridge to Success, a partnership between the City, San Francisco Unified School District, City College of San Francisco, SF State, and the community to double the number of youth who achieve college credentials (Bridge to Success 2017).

Need for New Housing. As stated in Final EIR Chapter 3, Project Description (page 3-2), to accommodate the projected growth in enrollment and academic activities, the adopted 2007 CMP envisions a building program that would develop of 0.9 million gross square feet of new and replacement non-residential building space on campus, and development or conversion of approximately 1,198 additional units of housing on campus for faculty, staff, and students. The housing proposed as part of the Project is consistent with the CMP building program, as demonstrated in Final EIR Chapter 3, Project Description (Table 3-2, page 3-7).

With the acquisition in the early 2000s of the former Stonestown apartments (now University Park North) and the northernmost blocks of Parkmerced (now University Park South), SF State added 959 units of housing. Approximately 27% of these housing units continue to be occupied by non-SF-State affiliates, reducing that number to 703 apartments available for SF State students and affiliates. These remaining units, together with the core housing—Mark Park, Mary Ward, the Village, and the Towers—allow SF State to house approximately 4,100 students out of a total headcount enrollment of approximately 30,000 students or approximately 14%.

The demand for on-campus housing exceeds the current supply. Priority is given to incoming freshmen, who occupy approximately 85% of the available on-campus housing. This leaves little opportunity for sophomores or upper-division students to live on campus, which is a limiting factor to their success. It is well established that on-campus living enhances the student experience. Students residing on campus have a higher GPA, on average, than their off-campus counterparts. These students also experience higher retention and persistence to graduation, and more often than not go on to earn advanced degrees.

As the cost of rental housing has soared in San Francisco and the Bay Area, finding affordable housing within a reasonable commute of campus has become increasingly difficult, further limiting the options for SF State students. As a result of the lack of affordable housing in the area and SF State’s limited supply of on-campus housing, many students choose not to enter SF State or leave after their first year. Currently,
the freshman 4-year graduation rate is at 18%, which is very low. Expanding the supply of on-campus housing would enable SF State to guarantee housing to first-year, transfer, and graduate students for a sufficient period to settle into campus life, establish themselves, and become stable members of the campus community.

Overall, on-campus housing has multiple benefits: it supports student retention and success; it eliminates long commutes and their associated greenhouse gas emissions; and it reduces the number of students competing for a limited supply of off-campus affordable housing, making that housing available to the larger community.

7-3 This comment questions why SF State needs another auditorium.

As discussed in Final EIR Chapter 3, Project Description (page 3-9), the Project would replace instructional and performance space in the current Creative Arts building that is outmoded, has multiple deficiencies, and cannot be renovated cost effectively. To prepare Broadcast & Electronic Communication Arts (BECA) students to enter the broadcast profession, the new Creative Arts replacement building would house instructional space that is right-sized and equipped with current technology. The concert hall would provide SF State with needed up-to-date assembly, lecture, and performance space that also would serve as a living lab for BECA students. The Creative Arts replacement building would be the first new academic building added to the campus in more than 20 years.

7-4 This comment indicates that Ohlone remains were paved over in building the current SF State campus, and that full reconciliation between SF State and the Ohlone should be achieved.

The subject of this EIR is the proposed Project, which is the Creative Arts & Holloway Mixed-Use Project. CEQA requires that the effects of the Project be compared to existing conditions, also called the baseline. As indicated in the Tiered Initial Study for the Project (Final EIR Appendix A), the 2007 CMP EIR provided an analysis of the cultural resources impacts associated with the CMP and identified a range of mitigation measures to reduce identified impacts to the extent possible. The Project is consistent with the 2007 CMP, and the Tiered Initial Study indicates that no new or increased cultural resource impacts would result with implementation of the Project.

The Tiered Initial Study also indicates that State Assembly Bill 52, effective July 1, 2015, recognizes that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities. The law establishes a new category of resources for CEQA called “tribal
cultural resources” that considers tribal cultural values, in addition to scientific and archaeological values, when determining impacts and mitigation.

California Public Resources Code Section 21084.2 establishes that “[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” The Public Resources Code Section 21080.3.1(b) requires a lead agency to consult with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project if the California Native American tribe requested in writing to be informed by the lead agency of proposed projects in conjunction with negative declarations, mitigated negative declarations and environmental impact reports.

There are no known resources on or adjacent to the Project site that would be considered a tribal cultural resource. No Native American tribe has contacted SF State or the Board of Trustees of the California State University to request consultation. Therefore, the Project would not result in impacts to archaeological resources or cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074. If a tribe contacts SF State in the future as outlined in the above paragraph, the campus would consult with the tribe per Assembly Bill 52.

7-5 This comment expresses concern over discontinuation of service to the Ingleside district due to M-line improvements.

The 19th Avenue Transit Study Final Report (SFCTA 2014) considers a few potential options for the southern portion of the route: service at-grade, underground, or aerial. The concept of undergrounding the M-line and terminating it in Parkmerced is one idea under study by the SFMTA but has not yet undergone environmental review or project approvals. In this alternative, service to the Ingleside district would not be eliminated, but instead would be provided by the J-Church, with a transfer station between the M-line and the J-line at SF State.

7-6 This comment indicates that, given the lengthy construction period, a centralized commission should be created so that all information related to construction projects and the various developers is aggregated and readily available. Information requested includes start and end of construction; all construction locations; and current environmental conditions and impacts related to air, water, soil, cultural remains, and trees.
Development of a centralized commission for the above-stated purposes is outside of the scope of this EIR and beyond the jurisdiction of SF State. However, information about the Parkmerced project, the Creative Arts & Holloway Mixed-Use Project, and other future SF State constructions projects are readily available, as described below.

**Parkmerced.** The Parkmerced project has already been approved by the City. Information about that project, including a project description, purpose of the project, documents for download (e.g., the EIR), development process and phasing, and implementation documents and applications are provided at [http://sf-planning.org/parkmerced-project](http://sf-planning.org/parkmerced-project). Information about current environmental conditions and impacts associated with that project is included in that EIR. Information about the timing of Phase 1 of the Parkmerced project is provided in the section on implementation documents and applications. City contact names are also provided if there are questions about this project.

**Creative Arts & Holloway Mixed-Use Project.** Information about the Project, including the Tiered Initial Study, Draft EIR, and this Final EIR, is provided at [http://cpdc.sfsu.edu/plan](http://cpdc.sfsu.edu/plan). Information about current environmental conditions and impacts associated with this Project is included in this Final EIR and the Tiered Initial Study attached to this Final EIR as Appendix A. In advance of construction, this Project, and any other future SF State project that has been approved and is pending or under construction, will be posted at [http://cpdc.sfsu.edu/campus-design](http://cpdc.sfsu.edu/campus-design) under “Current Projects.” This website shows the location of approved projects pending and under construction, and provides a link to details about those projects, including the construction schedule; project description and mapping; construction noise limits and notification requirements; and project team, including the construction manager. Contact information is also provided on this website for anyone who has questions about any project under construction. SF State also typically posts signs at campus construction sites with contact information and where to learn more about the project.

**Construction Coordination.** Additionally, as indicated in Final EIR Chapter 3, Project Description (page 3-19), a construction traffic control plan would be prepared by SF State and/or the construction contractors to address potential lane closures, construction vehicle access routes and parking, hours of construction, and other concerns in accordance with CMP EIR Mitigation HAZ-5A. The traffic control plan would comply with the City’s Encroachment Permit and/or Construction Permit requirements, if applicable. Given that Phase 1 of the Parkmerced project would be under construction at the same time as the proposed Project, SF State’s
Traffic control plan would be coordinated with the traffic control plan for that project to minimize temporary impacts on vicinity roadways.

7-7 This comment indicates that SF State conducted poor outreach about the Draft EIR.

SF State provided public noticing and outreach in accordance with the CEQA Guidelines. CEQA noticing and outreach included the following actions:

- **Notice of Preparation (NOP)** – An NOP was prepared and sent to applicable agencies and interested parties. The distribution list included representatives from Parkmerced, in addition to people, including a number of Parkmerced residents who had previously expressed interest in SF State projects. The NOP and Initial Study were made available on the SF State CMP website (http://cpdc.sfsu.edu/plan). Contact information for the Project planner was provided in the NOP and on the website for parties interested in receiving notification of future actions.

- **San Francisco Chronicle Ad** – An ad was placed in the San Francisco Chronicle to provide notice that an NOP was released, that the scoping period had begun, and that a scoping meeting would be held.

- **Scoping Meeting** – A meeting was held at the J Paul Leonard Library at SF State on July 27, 2016, for interested parties who wanted more information about the Project or to provide comments on the scope and content of the EIR. Notice of the meeting was sent to the Project distribution list (see the first bullet) and to nearby residents. People were provided the option to sign onto the distribution list to receive further notices about the Project.

- **Notice of Availability (NOA) of the Draft EIR** – Upon completion of the Draft EIR, an NOA was distributed to relevant local agencies and the Project distribution list (see the first bullet). All information was also posted on the SF State CMP website.

- **San Francisco Chronicle Ad** – An ad was placed in the San Francisco Chronicle to publish the NOA, which provided notice that the Draft EIR was released, that the public review period had begun, and that a Draft EIR public review meeting would be held.

- **Draft EIR Public Meeting** – A meeting was held at the J Paul Leonard Library at SF State on October 18, 2016, for interested parties who wanted more information about the Project or to provide comments on the Draft EIR. Notice of the meeting was sent to the Project distribution list (see first bullet) and nearby residents. The meeting was also advertised in the San
Francesco Chronicle. People were provided the option to sign the
distribution list to receive further notices about the Project.

In addition to the public notifications required by CEQA, SF State sent individual
letters and email messages to non-SF State residents of Block 1 to inform them of
CEQA public meetings (the scoping meeting and the Draft EIR public meeting). In
addition, SF State met with the staff of elected City officials to brief them on the
Project and coordinated with various City departments throughout the EIR
preparation process.

7-8 This comment indicates that the Project will increase greenhouse gas emissions.

As described in Final EIR Section 4.3, Greenhouse Gas Emissions (pages 4.3-26
through 4.3-34), Project-generated greenhouse emissions would be below the Bay
Area Air Quality Management District’s thresholds, and, therefore, would not have a
significant impact on the environment. The Project would not conflict with any plans,
policies, or regulations adopted for the purposes of reducing greenhouse gas
emissions, and would be consistent with the applicable strategies and measures in
the California Air Resources Board Scoping Plan, which provides a framework for
actions to reduce California’s greenhouse gas emissions.

See Response to Comment 1-2, which indicates that building materials containing
lead, asbestos, or other regulated materials would be abated prior to building
demolition. This abatement prior to building demolition would limit airborne lead
and asbestos during demolition.

7-9 This comment summarizes concerns expressed throughout the letter.

Please see Responses to Comments 7-1 through 7-8 for a response to this comment.
Anais Schenk

From: Wendy Bloom <wbloom@sfsu.edu>
Sent: Thursday, October 20, 2016 5:21 PM
To: Aaron Goodman
Cc: Noriko T. Shinzato; Roberta Boomer; Jason M. Porth; MTABoard; John Rahaim; Ana Sanchez
Subject: RE: Comments on the Focused Tiered Draft Environmental Impact Report (Draft EIR) for the Creative Arts & Holloway Mixed Use Project proposed on the San Francisco State University campus

Aaron,

Thanks very much for your comments on the Draft EIR.

Wendy

From: Aaron Goodman [mailto:agoodman@yahoo.com]
Sent: Wednesday, October 19, 2016 9:36 PM
To: Wendy Bloom <wbloom@sfsu.edu>
Cc: Noriko T. Shinzato; Roberta Boomer; Jason M. Porth; MTABoard; cmtboard@sfmta.com; John Rahaim; ana.sanchez@sfgov.com
Subject: Comments on the Focused Tiered Draft Environmental Impact Report (Draft EIR) for the Creative Arts & Holloway Mixed Use Project proposed on the San Francisco State University campus

Wendy Bloom,

I was unable to attend the meeting on Tuesday night due to a conflict in scheduled meetings. The EIR for SFSU-CSU’s Creative Arts and Holloway Mixed Use Project proposed for SFSU-CSU. Please accept this email as my brief comments on the EIR and scope.

My concerns on the proposed project and its impacts on the Parkmerced community and the overall EIR for the SFSU-CSU Masterplan have been documented prior during the SFSU-CSU initial Masterplan as formally submitted on the EIR and issues/concerns with its approach and view of the Parkmerced UPS blocks and impacts, and still are valid concerns based on the proposed development and demolition of the sound housing stock that exists in Parkmerced. No report of documentation has been issued on the condition (post SFSU-CSU’s renovations) on the existing conditions and need to demolish sound affordable housing nor the costs expended on the UPS renovations to date this information should be made public as an example of rehabilitation costs of the SFSU-Housing Department for an understanding of the costs of running the purchased blocks, and the pricing issues, and how the SFSU-U Corp needs to create “value” and profit on the housing of the neighborhood vs. development on its own and prior defined borders pre- UPS and UPN purchases. If the UPS blocks continue forward as an alternative it should be shown and considered that it could be utilized as Staff and Faculty housing for families, and should be considered an alternative with infill housing concepts on the parking areas of those blocks with small well designed pencil thin towers that could go up 8-12 stories as infill student housing on the existing layout without destroying the low-scale quality of the park-like setting. Other alternatives should include development and density of the UPN blocks initially to off-set the immediate impacts of multiple construction sites on the Parkmerced blocks, which already are drastically going to affect quality of life, and living conditions of the residents of Parkmerced. Having multiple sites by SFSU and Parkmerced’s ownership occurring simultaneously is a severe and avoidable impact if SFSU-CSU looks at
the UPN blocks initially for housing density and infill prior to the UPS blocks and should be looked at as an alternative to lessen the environmental impacts of noise, dust, and construction parking impacts on site.

SFSU-CSU has not addressed the loss-of-use of the former open-spaces of Parkmerced, nor the amenities lost (example: the Frederick Burke Elementary School, community building, tennis courts, basketball courts, softball fields, and smaller garden/planted areas and open space) and how this has affected the livability of the prior community. The loss of access to the larger open-space parcel with the build-out of the “wellness-center” has not been indicated if the new buildings will be available to Parkmerced long-term residents at a lower rate, or if the impacts created by the large structure have or will have any physical impacts on the surrounding community currently or in the future when in full use. The impacts on the community should be documented as a tiered EIR to determine if any environmental impacts are being ignored such as the housing impacts and transit/traffic/parking issues noted below.

SFSU-CSU has not addressed the housing impacts they have created in the purchase of the larger apartment complex of UPN (Stonestown Apartments) and UPS (Parkmerced blocks) as prior affordable rental housing for families, seniors, and working class San Franciscans. The impacts of student increases on the general housing stock, and the impacts of students (CSU-Campus laws) no-smoking, no pets, and no-drinking. Which are not enforceable in Parkmerced as general housing stock, and therefore incentivizing further student encroachment into the remaining Parkmerced blocks. The loss of housing impact will not be solved with these smaller projects, and SFSU-CSU needs to show a longer term planning effort on housing along 19th Ave. and adjacent to the Eastern and NE corner of campus, near shopping and transit facilities.

SFSU-CSU has failed to address the parking, traffic and mass transportation impacts created by their enlargement and the impacts the removal of the parking central structure will have on the surrounding streets and neighborhoods. There has been no indication of garage replacement and Parkmerced's below grade garages appear to be the only location for future SFSU-CSU parking needs, and this will most likely be at an inflated rate which students will not pay, thus leading to more concerns about off-street and neighborhood parking impacts if transportation issues are not adequately addressed up front prior to the densification proposed. The gater pass was a small step, but without a future direct connection to Daly City BART the real TDM, and transit vision for the SFSU-CSU sustainability issues is questionable since the impacts will continue to worsen traffic and parking wise, unless their is a serious decision to ramp up the discussions between Stonestown, SFSU-CSU and Parkmerced on the future M-Line extension out to Daly City as part of the Tier-5 Level Federal Funding being sought for planning and implementation of the extension. Transportation alternatives should include a larger capacity and/or frequency West-side shuttle line route that goes around the UPN/UPS sites and connects to Daly City's shopping areas, as well as BART so students can get to mass transit options easily. This should be considered a transit alternative, to ensure that until and including the M-Line extension, SFSU-CSU is asked to work together with the other developments through an MOU to fund and help pay for the future extension to Daly City BART. Funds garnered from parking facilities and price increases on transit related fines, or programs through the TDM should be forwarded towards the goal of extending the M-Line to Daly City BART. Capacity of the M-Line and the concerns of overcrowded platforms, and trains create a serious safety issue for seniors, children and the disabled on the existing platform. Alternatives for a temporary fix inclusive of a two-sided platform access design and cross-over should be implemented until the shift to a west-side alternative, or underground/airline design is decided and completed to improve pedestrian safety at this station. Parking/Traffic and Transit impacts will need to be collected and documented due to the Tiered impact study of this draft EIR report. There needs to be documentation of parking trends, and the impacts on the surrounding streets and communities to determine how and in what ways SFSU-CSU needs to be held accountable for their transit/traffic and parking impacts. As the projects proposal will drastically change and blur the prior Holloway "border" line which was a distinct separation between the university and Parkmerced community this blurring of boundaries and its impacts on the protected class of families and family styled housing, should be documented to determine if their has been a
large enough net-loss of family sized and scaled housing that there needs to be a revision to the SF General Plan to incentivize affordable rental housing construction in surrounding neighborhoods that are primarily home-ownership to ensure a proper and adequate balance of housing types per the SF General Plan is being constructed equitably in the surrounding areas and district adjacent to the enlargement of SFSU-CSU. The need to ensure in the documentation of this EIR like the changes in roadways and road-way diets, that there is enough housing capacity in D7 to absorb the loss of low-scaled family housing due to SFSU-CSU’s construction impacts and the need to re-balance or re-zone other single family home areas in the district, so that our neighborhood is not disproportionately impacted by all the housing construction impacts should be brought to the SF Planning Department and planning commission as a nexus study on the overall impacts of family housing in the western neighborhoods of SF, and the need to pro-actively promote new alternatives to density, that lessen the impacts on families and seniors, due to institutional growth.

Thank you for your time and efforts in considering these comments, alternatives, and studies suggested, and providing responses in regards to the universities Tiered EIR for the creative arts and mixed use proposal projects;

Sincerely

Aaron Goodman
email: anugodman@yahoo.com

BCC - recipients please do submit comments on the impacts of this project if so inclined, or if you would want to be removed from any further bcc's...on this project please email me directly at the email provided.
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Response to Comment Letter 8

Aaron Goodman
October 20, 2016

8-1 This comment indicates that no report or documentation has been issued on the condition of the existing housing on the Project site and the need to demolish sound affordable housing.

The SF State campus is landlocked. With the acquisition in the early 2000s of the former Stonestown apartments (now University Park North) and the northernmost blocks of Parkmerced (now University Park South), SF State was able to expand the campus to support the growth of academic and other programs and housing. The Block 1 portion of the Project site would be developed for academic and related uses with the Creative Arts replacement building and the concert hall. Use of this site for these uses meets both 2007 CMP and project-specific objectives provided in Chapter 3, Project Description (pages 3-4 through 3-6).

The need for new housing on the SF State campus is discussed in Response to Comment 7-2 under the subheading “Need for New Housing.”

8-2 This comment indicates that an alternative should be considered that retains the University Park South blocks for staff and faculty housing, with infill student housing on the parking areas of those blocks with small, well-designed, pencil-thin towers that could go up to 8–12 stories.

This Final EIR provides a reasonable range of alternatives as required under CEQA Guidelines Section 15126.6(f), including a Reduced Project Alternative (Partial Reuse/Preservation), see Chapter 6, Alternatives (pages 6-13 through 6-17). This alternative looks at partial reuse and redevelopment of Block 6, while retaining a portion of the original apartments on the block. There is no off-street parking on Block 6 so redevelopment of such a parking area was not considered under this alternative. This alternative does not consider partial reuse/preservation on Block 1, as the existing residential buildings on this site are not conducive to reuse and rehabilitation for academic uses. Therefore, this alternative includes the Creative Arts replacement building and concert hall on Block 1, as planned for the Project.

A partial reuse/preservation alternative on Block 5, instead of Block 6 for example, where off-street parking does exist, would likely have similar impacts and ability to meet the Project’s objectives, as described for the Reduced Project Alternative (Partial Reuse/Preservation) (see Chapter 6, Alternatives, Tables 6-2 and 6-3, pages
6-23 through 6-32). Similar to the Reduced Project Alternative (Partial Reuse/Preservation) that involves Block 6, a partial reuse/preservation alternative that involves Block 5 would also reduce the impacts of the Project. However, it would not meet many of the basic objectives of the Project, as discussed in Table 6-2. Given that the Final EIR provides a reasonable range of alternatives, further detailed analysis of a partial reuse/redevelopment alternative that involves Block 5, instead of Block 6 is not provided.

8-3 This comment indicates that redevelopment of the University Park North blocks should go forward before redevelopment of the University Park South blocks to lessen the environmental impacts of noise, dust, and construction parking associated with SF State and Parkmerced construction projects.

Final EIR Chapter 6, Alternatives does consider an alternative that would redevelop a block in University Park North for housing, instead of Block 6 in University Park South (see the Alternative Site Locations – Avoidance of Former Parkmerced Properties, pages 6-19 through 6-22). This alternative would also avoid Block 1 in University Park South and use the adjacent West Campus Green for the Creative Arts replacement building and the concert hall. This alternative would reduce the historic resource impacts of the Project and is considered the environmentally superior alternative (Final EIR Chapter 6, Alternatives, page 6-22). However, it would not meet many of the basic objectives of the Project, as described on page 6-20 and shown in Table 6-2.

See also Response to Comment 4-3 for information about noise, dust, and construction parking associated with SF State and Parkmerced construction projects.

8-4 This comment indicates that SF State has not addressed the loss of use of the former open spaces of Parkmerced, nor the amenities lost. The comment notes the loss of access to the larger open-space parcel with the build-out of the Mashouf Wellness Center and the lack of clarity about whether the new building will be available to Parkmerced long-term residents. The comment states that a tiered EIR should document the environmental impacts of the Mashouf Wellness Center when it is in full use.

The Tiered Initial Study addresses the potential for parks and recreational impacts of the Project (see Appendix A, Section 4.15 of this Final EIR, page 64). It reports that implementation of the 2007 CMP would not result in a significant use of off-campus parks or recreational facilities, given the presence of existing and planned recreational facilities on campus (see CMP EIR Impact UTL-5). The Project would
not increase the demand for parks or recreational services, as the Project would not result in a substantial population increase, as documented in Tiered Initial Study Section 4.13 (pages 59 through 61).

Students living in the new Project housing, as well as local visitors to neighborhood retail, would be able to use the urban open spaces planned for Block 6, including an open-air interior courtyard with tables and seating, and an exterior plaza with benches. The Tapia Drive street vacation would also create open space for pedestrian and bicycle use, as it would result in a major east/west walkway connecting the central academic core with sites to the west. All SF State students and affiliates would be able to use the new Mashouf Wellness Center once completed and other recreational facilities on campus.

As the Project would not substantially increase the demand for parks and recreational services, it would not result in substantial physical deterioration of existing facilities, or the need for new or expanded facilities. Therefore, environmental impacts associated with the construction of such facilities would not occur and the impact would be less than significant, as concluded in the CMP EIR. Thus, no new or increased impacts on off-campus parks and recreational facilities would result with the Project.

The Project would not change current campus practices related to the public use of outdoor fields and courts. SF State fields and courts that would continue to be available for public use, when not being used for campus classes and organized activities include: the West Campus Green (until developed in the future); the Mashouf Wellness Center field, once construction is complete; the tennis courts; and Cox Stadium and track.

The environmental impacts of the Mashouf Wellness Center Project were evaluated in a Tiered Initial Study/Mitigated Negative Declaration that was adopted by the Board of Trustees of the California State University in May 2014.

8-5 This comment indicates that SF State has not addressed the affordable housing impacts created in the purchase of University Park North and University Park South. The comment also indicates that the loss of affordable housing impact will not be solved with these smaller projects and SF State needs to show a longer-term planning effort on housing along 19th Avenue and adjacent to the northeast corner of the campus near shopping and transit facilities.

The Tiered Initial Study addresses the population and housing impacts of the Project, within the context of the CMP EIR population and housing analysis (see Appendix A,
Section 4.13 of this Final EIR, pages 59 through 61). A comment received during the Scoping period for the Project indicates that the impact should be considered a potentially significant new or increased impact due to the lack of affordable housing options on the westside of San Francisco. The Tiered Initial Study analysis and the analysis provided in the CMP EIR are based on an evaluation of the CEQA standards of significance for population and housing. The standards would be exceeded and a significant impact identified, if the Project would result in the displacement of housing or people that would necessitate the construction of new housing elsewhere. The physical effects on the environment of the construction of new housing elsewhere, are the impacts covered by the standards. As indicated in the Tiered Initial Study, the displacement of existing tenants in seven units on Block 1 of the Project site would not result in the need to construct new housing elsewhere in San Francisco or the region, and therefore the impact under CEQA would be less than significant.

There are City policies and regulations in place to address and provide for an adequate housing supply and affordable units, such as the City’s Housing Element (CCSF 2015) and the Major’s Office of Housing and Community Development. The 2007 CMP does include a broader, longer-term housing program that looks at redevelopment of existing housing in University Park North and University Park South to provide for more campus housing. The student housing being provided with the Project and in the future under the 2007 CMP would result in existing students relocating from other housing in San Francisco and elsewhere, which would result in new vacancies and available units elsewhere, some of which may be affordable. Overall, the Project would increase the local supply of housing and would provide for new housing that is affordable to students.

See Response to Comment 8-3 for information about why redevelopment in University Park South is preceding redevelopment in University Park North.

This comment indicates that SF State has not addressed parking, traffic and mass transportation impacts created by campus enlargement and the impacts of removal of the central parking structure. The comment also indicates a need for a direct M-line connection to the Daly City BART station as well as frequent shuttle service to University Park North, University Park South and Daly City shopping areas.

Please refer to Response 4-1 above for a discussion of parking. A detailed analysis of potential impacts related to vehicle trip and transit trip generation is provided in Section 4.5, Transportation (pages 4.5-24 through 4.5-28).
The campus currently provides shuttle service to University Park South, University Park North, and Daly City BART. The development of Parkmerced would include implementation of a new shuttle service to the Daly City BART Station with 7.5 minute frequencies during peak periods, and 15 minute frequencies during off-peak periods. Although there have been no formal agreements with Parkmerced, SF State would consider combining shuttle service to provide one comprehensive service between Parkmerced, SF State, and the Daly City BART Station, if mutually beneficial.

In 2007, the City and SF State entered into a Memorandum of Understanding (MOU) (SF State 2007c) that provided more detailed information on the conditions of funding from SF State for contribution to off-campus mitigation measures. SF State continues to provide maintenance of the M-line platform. SF State also contributed to the 19th Avenue Transit Study (CCSF 2014). From the Daly City BART station riders can connect to Routes 120 or 121, which provide service to the Daly City Serramonte Shopping Center.

8-7 This comment indicates that a revision to the San Francisco General Plan may be needed to incentivize affordable rental housing construction in surrounding neighborhoods to ensure a proper balance of housing types. It further asks whether there is enough housing capacity to absorb the loss of low-scaled family home areas so that one neighborhood is not disproportionately affected by all of the housing construction impacts. Lastly, the comment asks for a nexus study by the SF Planning Department and planning commission on the overall impacts on family housing in the western neighborhoods of San Francisco and the need to proactively promote new alternatives to density that lessen the impacts on families and seniors.

As indicated in Response to Comment 7-6, the City already approved the Parkmerced project. The need for a nexus study or other actions to retain and/or facilitate the development of low-scale affordable rental housing in other western neighborhoods is outside the scope of this EIR and within the jurisdiction of the City and not within the jurisdiction of SF State to pursue. See Response to Comment 8-5 above for information about affordable housing.
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7.3 REFERENCES


Nelson/Nygaard. 2016. *San Francisco State University 2016 Transportation Survey Results*.


SF State. 2007c. Memorandum of Understanding: City and County of San Francisco and California State University/ San Francisco State University. October 29, 2007.
