

Findings of Fact and Statement of Overriding Considerations

Pursuant to Sections 21081 and 21081.6 of the Public Resources Code
and Sections 15091 and 15093 of the CEQA Guidelines

Creative Arts & Holloway Mixed-Use Project San Francisco State University



Final Environmental Impact Report

State Clearinghouse Number 2016072013

May 2017

FINDINGS OF FACT

1.0 INTRODUCTION

1.1 Purpose

This statement of Findings of Fact addresses the environmental effects associated with the San Francisco State University (SF State) Creative Arts & Holloway Mixed-Use Project (Project) located on the SF State campus in San Francisco, California. These Findings are made pursuant to the California Environmental Quality Act (CEQA) under Sections 21081 and 21081.6 of the Public Resources Code and Sections 15091 of the CEQA Guidelines, Title 14, Cal. Code Regs. 15000, et. seq.

As the CEQA lead agency, the Board of Trustees of the California State University (Board of Trustees) certified the SF State Campus Master Plan (CMP) EIR (SCH No. 2006102050) in 2007 and adopted the 2007 CMP. The Project conforms to the adopted CMP building program and, therefore, the CEQA analysis for the Project is tiered to the 2007 CMP EIR. Based on the results of a Tiered Initial Study (Tiered IS) and the Scoping process, SF State determined that a Focused Tiered EIR is the appropriate CEQA document to evaluate potential impacts related to aesthetics, air quality, greenhouse gas emissions, historical resources, and transportation. The new significant impact associated with the Project was identified in both the Draft Environmental Impact Report (EIR) and the Final EIR, as well as additional facts found in the complete record of proceedings.

Public Resources Code 21081 and Section 15091 of the CEQA Guidelines require that the lead agency prepare written findings for identified significant impacts, accompanied by a brief explanation for the rationale for each finding. The Board of Trustees is the lead agency responsible for preparation of the EIR in compliance with CEQA and the CEQA Guidelines. Section 15091 of the CEQA Guidelines states, in part, that:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

In accordance with Public Resource Code 21081 and Section 15093 of the CEQA Guidelines, whenever significant impacts cannot be mitigated to below a level of significance, the decision-making agency is required to balance, as applicable, the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable." In that case, the decision-making agency may prepare and adopt a Statement of Overriding Considerations, pursuant to the CEQA Guidelines.

Section 15093 of the CEQA Guidelines state that:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091. As required by CEQA, the Board of Trustees, in adopting these findings, also adopts a Mitigation Monitoring and Reporting Program for the Project (Project MMRP). The Board of Trustees finds that the Project

MMRP, which is incorporated by reference and made a part of these findings, meets the requirements of Section 21081.6 of the Public Resources Code by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the project.

The Final EIR for the Project identified a new significant cumulative effect related to historic resources that could result from Project implementation. The Board of Trustees finds that the inclusion of a certain mitigation measure as part of the Project approval will reduce the effect, but not to a less than significant level. The impact that is not reduced to a less than significant level is identified and overridden due to specific Project benefits in a Statement of Overriding Considerations. In accordance with CEQA and the CEQA Guidelines, the Board of Trustees adopts these findings as part of its certification of the Final EIR for the Project. Pursuant to Section 21082.1(c)(3) of the Public Resources Code, the Board of Trustees also finds that the Final EIR reflects the Board of Trustee's independent judgment and analysis, as the lead agency for the Project.

Additionally, the Tiered IS for the Project concluded that there could be some Project construction activities where the noise levels would not be reduced to levels below the threshold, even with the adopted CMP EIR mitigation measure. Therefore, conservatively, the Project impact would be significant and unavoidable, as concluded in the 2007 CMP EIR, but no new or increased impacts would occur with the Project. The Findings and Statement of Overriding Considerations adopted by the Board of Trustees in connection with its approval of the 2007 CMP and certification of the 2007 CMP EIR addressed this impact. Those Findings and Statement of Overriding Considerations are equally relevant to, and are reaffirmed by the Board of Trustees as a part of, this Project.

1.2. Organization and Format of Findings

Section 1.0 contains a summary description of the project and background facts relative to the environmental review process. Section 2.0 discusses the CEQA finding of independent judgment. Section 3.0 provides the "Findings of Fact" for the Project. Section 3.1 of these Findings identifies the previously identified CMP significant impact that the Project would contribute to. Section 3.2 identifies the new significant impact of the Project that cannot be mitigated to a less than significant level, even though the feasible mitigation measure has been identified and incorporated into the Project. Section 3.3 identifies the potentially significant effects of the Project that would be mitigated to a less than significant level with implementation of the identified mitigation measures. Section 3.4 identifies the Project's potential environmental effects that were determined not to be significant and, therefore, do not require mitigation measures. Section 3.5 identifies other CMP environmental effects that were adequately addressed in the Tiered IS for the Project. Section 4.0 discusses the feasibility of Project

alternatives. Section 5.0 discusses findings with respect to mitigation of significant adverse impacts, and adoption of the Project MMRP.

1.3 Summary of Project Description

The Project would include construction of new housing, neighborhood-serving retail, and student support services on the south side of Holloway Avenue, and construction of the Creative Arts replacement building and concert hall on the north side of the Holloway Avenue/Font Boulevard intersection. The Project would also include preparation and implementation of design guidelines, transportation and parking improvements, utility connections, storm drainage improvements, landscaping, lighting, and the implementation of applicable 2007 Campus Master Plan (2007 CMP) mitigation measures adopted as part of the 2007 CMP MMRP. A revision to the existing Master Plan map would be required to allow for the proposed uses on the identified sites. All key elements of the Project are summarized in Table 1.

**Table 1
Project Summary**

Project Element	Existing Project Site Conditions	Proposed Project Site Conditions	Net Change on Project Site	Campus-wide Development Allowed Under 2007 CMP
Student housing (Block 6)	173 beds (Blocks 1 & 6) 7 units (Block 1) ¹	550 beds	355 beds	1,198 units ² (approximately 2,995 beds)
Neighborhood-serving retail/student support services (Block 6)	None	33,000 gross square feet (GSF)	33,000 GSF	CMP calls for neighborhood retail on Holloway Avenue, but specific square footage or location on Holloway Avenue is not identified.
Parking facilities	53 auto spaces ³ 9 motorcycle spaces ³	72 parking spaces	0 parking spaces⁴	No net increase in parking
Creative Arts replacement building (Block 1)	None	76,350 GSF	76,350⁵ GSF	133,500 GSF Creative Arts 149,000 GSF Classroom/Faculty Offices ⁶
Concert hall (Block 1)	None	60,000 GSF 800 seats	60,000 GSF 800 seats	Square footage included in Creative Arts space above

Source: Data compiled by SF State in 2016.

¹ The seven units are occupied by approximately 3.1 people per unit which is equivalent to 22 beds.

² CMP EIR Table 3-3 (Final EIR, Chapter 3, Changes to the Draft EIR).

³ Parking located on Tapia Drive.

⁴ Parking would be removed elsewhere on campus to provide for no net increase in parking with the Project.

⁵ 11,000 GSF of the total space would be for general classroom space.

⁶ CMP EIR Table 3-2 (Final EIR, Chapter 3, Changes to the Draft EIR).

1.4 Project Objectives

The Project objectives below are drawn from the adopted 2007 CMP:

1. Replace significant portions of the existing Creative Arts building, which has various deficiencies and no longer supports the academic program, and construct a new concert hall with recording and broadcast capability to provide hands-on learning for BECA (Broadcast & Electronic Communication Arts) students and support SF State and community programs.
2. Reinforce the academic core and extend it westward to create a contiguous, uninterrupted academic core. The Creative Arts replacement building and concert hall would occupy a pivotal location at Holloway Avenue and Font Boulevard, in proximity to residential mixed-use development and adjacent to College of Liberal and Creative Arts facilities to provide for programmatic collaboration.
3. Position semi-public uses, such as the concert hall, at the corners or edges of campus, creating icons that redefine SF State's external identity and engage the larger community.
4. Provide for the most efficient and effective use of the West Campus Green and the Tapia Triangle for planned future Creative Arts programs.
5. Provide new on-campus student housing to aid in recruitment and retention of students and to provide close-in housing that enables students to walk to school, thereby reducing commute trips to campus and associated greenhouse gas (GHG) emissions.
6. Begin to integrate and make efficient use of more recently acquired residential properties located along the southern edge of the campus.
7. Locate new student housing, neighborhood retail, and support services in proximity to the existing Muni M line and bus lines and to the future planned underground Muni M line and station and to planned 19th Avenue bicycle and pedestrian facilities. Additionally, locate the above uses in immediate proximity to the academic core of the campus, where pedestrian access to the core is readily available.
8. Locate higher-density student housing with ground-floor neighborhood retail and services along Holloway Avenue to redefine Holloway Avenue as a "college main street."

9. Ensure that new construction achieves LEED (Leadership in Energy and Environmental Design) Gold or equivalent performance and energy efficiency beyond California Energy Commission Title 24 requirements. LEED Platinum certification (or an equivalent rating under WELL or another green building rating system) and ZNE (zero net energy) should be targeted, and the Project should meet other CMP and Climate Action Plan (SF State 2010) sustainability objectives.

1.5 Environmental Review Process

Tiering to Campus Master Plan EIR: The Board of Trustees certified the SF State CMP EIR (SCH No. 2006102050) in 2007. The 2007 CMP is a comprehensive document that addresses all aspects of future physical development and land use on the SF State campus to accommodate the increased enrollment ceiling of 25,000 full-time-equivalent students. The 2007 CMP is guiding change to the campus over the long term, and will ultimately give physical form to the SF State's strategic vision and values. The purpose of the 2007 CMP is to address acquisition of property, older facilities, changing student demographics, and the need for additional academic building space and other support space to accommodate the growth in enrollment anticipated to occur through the planning horizon (2020).

The Project conforms to the 2007 CMP building program and, therefore, the CEQA analysis for the Project is tiered to the 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 solely on the issues specific to the relevant activities/project (14 CCR 15152(a)). A later EIR is required when the Initial Study or other analysis finds that the later project may cause a significant effect on the environment that was not adequately addressed in the prior EIR (14 CCR 15152(f)).

Tiered Initial Study and Notice of Preparation: In accordance with the requirements of CEQA and the CEQA Guidelines, to determine the number, scope and extent of environmental issues that needed to be studied in the Draft EIR, a Notice of Preparation (NOP) for the Draft EIR was circulated for public review for a period of 30 days, beginning on July 6, 2016 and ending on August 8, 2016.

A Tiered IS was attached to the NOP. The Tiered IS was tiered to the 2007 CMP EIR. The Tiered IS evaluated potential environmental effects of the Project, identified the issues that were adequately addressed in the CMP EIR, and identified the issues that would require further analysis in the EIR for the Project.

Draft EIR: In accordance with the requirements of CEQA and the CEQA Guidelines, a Focused Tiered Draft EIR was prepared to address the potential significant environmental effects associated with the Creative Arts & Holloway Mixed-Use Project identified in the Tiered IS and during the scoping process. The Tiered IS concluded that the Project may have potentially significant effects on the environment that were not previously or adequately addressed in the CMP EIR, or may have environmental effects that are less than significant but have been selected for further analysis and disclosure. Based on the NOP/Tiered IS and the results of the scoping process, the EIR analyzes potential project and cumulative impacts related to:

- Aesthetics
- Air Quality
- Greenhouse Gas Emissions
- Historical Resources
- Transportation

The Focused Tiered Draft EIR was prepared to further evaluate the potential for significant impacts or substantially more severe impacts in these topic areas not previously identified in the CMP EIR, and to develop, if necessary, Project-specific mitigation measures.

The Draft EIR was released for a 45-day public and agency review period from September 27, 2016 to November 11, 2016. SF State held a public meeting on October 18, 2016 to provide the public an opportunity to comment on the adequacy of the information presented in the Draft EIR. During the Draft EIR public review period, SF State received eight comment letters, including one comment that was submitted at the public meeting.

Final EIR: Section 15088 of the CEQA Guidelines requires that the lead agency responsible for the preparation of an EIR evaluate comments on environmental issues and prepare a written response addressing each of the comments. The Final EIR assembles in one document all of the environmental information and analysis prepared for the Project, including responses to all public comments received and revisions required to the Draft EIR as a result of public comments received and as otherwise needed. 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 CEQA Guidelines, Section 15088.5, recirculation of the Draft EIR is not required.

2.0 CEQA FINDING OF INDEPENDENT JUDGEMENT

The Final EIR reflects the Board of Trustees' independent judgment. The Board of Trustees has exercised independent judgment in accordance with Public Resources Code 21082.1(c)(3) in retaining its own environmental consultant in the preparation of the EIR, as well as reviewing, analyzing and revising material prepared by the consultant.

Having received, reviewed, and considered the information in the Final EIR, as well as any and all other information in the record, the Board of Trustees hereby makes findings pursuant to and in accordance with Sections 21081, 21081.5, and 21081.6 of the Public Resources Code.

3.0 FINDINGS OF FACT

3.1 Environmental Effects of the Adopted CMP Considered Unavoidable Significant Impacts

This section identifies the significant unavoidable impacts of the previously adopted CMP that the Project would contribute to. This impact does not require a new statement of overriding considerations to be issued by the Board of Trustees, pursuant to Section 15093 of the CEQA Guidelines. However, the prior Findings and Statement of Overriding Considerations is reaffirmed herein in relationship to the Project's contribution to this impact. Based on the analysis contained in the Final EIR, the Project would contribute to the following significant and unavoidable impact:

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

Summary of CMP Noise Impact

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

Adopted Mitigation Measure

CMP Mitigation NOIS-I, adopted by the Board of Trustees in 2007 as part of the CMP MMRP and incorporated into the Project, would reduce this impact to the extent feasible.

Prior Findings

The Findings and Statement of Overriding Considerations adopted by the Board of Trustees in connection with its approval of the 2007 CMP and certification of the 2007 CMP EIR addressed this construction noise impact. Relative to this impact that the 2007 CMP EIR found to be significant and unavoidable, the Board of Trustees reaffirms the statement of overriding considerations adopted in tandem with the approval of the 2007 CMP and certification of the 2007 CMP EIR. As one component of the development envisioned in the 2007 CMP, the Project will contribute to the various benefits identified in that statement of overriding considerations.

3.2 Environmental Effects of the Project Considered Unavoidable Significant Impacts

This section identifies the one new significant unavoidable impact that requires a statement of overriding considerations to be issued by the Board of Trustees, pursuant to Section 15093 of the CEQA Guidelines, if the Project is approved. Based on the analysis contained in the Final EIR, the following new impact has been determined to be significant unavoidable:

- Cumulative historic resource impact associated with the removal of existing housing, which is part of the Parkmerced Remnant Historic District (Project Impact CULT-5B).

Summary of Historic Resource Impact

This Final EIR determined that the Project would result in one new significant and unavoidable impact compared to the impacts identified in the CMP EIR (see Final EIR Section 4.4). The Project would have a significant adverse cumulative impact related to historical resources. The proposed demolition of Blocks 1 and 6 and removal of existing landscape features on the Project site would contribute to a significant cumulative impact on the historic significance of the Parkmerced Remnant Historic District, identified during the preparation of this EIR, as it would erode its integrity. The Project's contribution to this significant cumulative impact would be cumulatively considerable (see Project Impact CULT-5B). This significant cumulative impact can be reduced through the implementation of CMP EIR Mitigation CULT-2A through CULT-2C as part of the Project and through the implementation of Project Mitigation CULT-5B (see below). However, the impact is significant and unavoidable as the implementation of the feasible mitigation measure would not reduce the impact to less than significant. This is considered a new significant cumulative impact, as the CMP EIR did not contemplate impacts to eligible historic districts and did not identify a significant cumulative impact on historic resources.

Mitigation Measure

Project Mitigation CULT-5B:

The following mitigation measures are recommended in advance of the Project, and elaborate on the mitigation measure outlined in the Campus Master Plan EIR's Mitigation CULT-2C (ii).

DOCUMENTATION:

SF State shall facilitate documentation of the affected historic resource and its setting. Generally, this documentation shall be in accordance with Historic American Building Survey (HABS) Level II per Campus Master Plan EIR Mitigation CULT-2C(ii), which includes:

- i. **Drawings:** Select original Church and Schultze drawings of Blocks 1 and 6, if available from Parkmerced Investors LLC or the San Francisco Planning Department,¹ should be photographed with large-format negatives or photographically reproduced on Mylar. Measured drawings are not required, as these were completed for each type of building as part of the mitigation for demolition of the Parkmerced site (completed by Page & Turnbull in 2016).
- ii. **Photographs:** Archival printed digital photographs of exterior and interior views of Blocks 1 and 6. These photographs must adequately document the character-defining features of the buildings and should be produced by a qualified professional who is familiar with the character-defining features of the buildings, as identified in the Historic Resource Evaluation completed by Page & Turnbull in 2009 and information provided in this report. Photographs should include general views that illustrate the setting; the exterior façades; the courtyard façades; details including front entrances and/or typical doorways; typical windows; exterior details indicative of the era of construction or of historic or architectural interest; and interior views to capture spatial relationships and any decorative elements. An example of printed digital photographs, site plans, and photo captions can be found in the Parkmerced HABS-HALS photographs produced as part of the mitigation for demolition of the Parkmerced Investors LLC site. These photograph sets are located at the San Francisco Public Library History Center and the Northwest Information Center of the California Historical Resources Information System. The photograph set for Blocks 1 and 6 should correspond to the previously produced sets.
- iii. **Written data:** Not required, as these blocks are covered in the HABS-HALS written report produced as part of the mitigation for demolition of the Parkmerced Investors LLC site.

¹ Parkmerced Investors transferred a set of historic Parkmerced drawings to the San Francisco Planning Department to be archived as part of the Parkmerced project's cultural resource mitigation measures.

HABS material standards regarding reproducibility, durability, and size shall be met. The HABS Level II documentation shall be completed by professionals who meet or exceed the Secretary of the Interior's Professional Qualification Standards for History or Architectural History.

Three copies of the drawings and photographs should be provided to the San Francisco Public Library History Center, the Northwest Information Center of the California Historical Resources Information System, and SF State University.

This mitigation would create a collection of preservation materials that would be available to the public and inform future research. Implementation of this mitigation measure will assist in reducing the project-specific impacts; however, according to Section 15126.4(b)(2) of the Public Resources Code (CEQA), HABS-level documentation of a historical resource as mitigation for significant impacts of demolition of the resource will typically not mitigate the impacts to less-than-significant.

VIDEO RECORDATION:

SF State will facilitate the creation of a walk-through video of Blocks 1 and 6 and their Parkmerced setting, including an exterior overview of adjacent streets (with medians and traffic circles), nearby tower apartments, and primary public spaces at Parkmerced such as the central Common and the Meadow. The documentation shall be conducted by a professional videographer, preferably one with experience recording architectural resources. The documentation shall be narrated by a qualified architectural historian. The documentation shall include as much information as possible—using visuals in combination with narration—about the materials, construction methods, current condition, historic use, and historic context of the historical resources. Copies of the video documentation shall be submitted to the San Francisco Public Library History Room, the Northwest Information Center, and SF State University. This mitigation measure will supplement the traditional HABS-HALS documentation.

Findings

The Board of Trustees finds that even with the incorporation of the identified Project mitigation measure and the previously adopted CMP EIR mitigation measures incorporated into the Project, the cumulative impact on the Parkmerced Remnant Historic District resulting from removal of the buildings and other features on the Project site will remain significant and unavoidable.

Pursuant to Section 21081(a)(3) of the Public Resources Code, as described in the Statement of Overriding Considerations, the Board of Trustees has determined that specific economic, legal, social, technological, or other benefits, make infeasible the alternatives identified in the EIR and

the identified impact on historic resources is thereby acceptable because of specific overriding considerations (see Statement of Overriding Considerations).

3.3 Environmental Effects Evaluated in the Final EIR Which Can Be Avoided or Substantially Lessened to Less Than Significant Levels with Implementation of the Identified Mitigation Measures

This section identifies significant adverse impacts of the Project that require findings to be made pursuant to Section 21081 of the Public Resources Code and Section 15091 of the CEQA Guidelines. Based on information in the Final EIR, the Board of Trustees finds that based upon substantial evidence in the record, no impacts were identified in the Final EIR that can be reduced to less than significant levels with implementation of the new Project mitigation measures. Therefore, the Board of Trustees has determined that findings are not required for such impacts.

3.4 Environmental Effects Found to Be Less Than Significant

This section identifies impacts of the Project that are less than significant and do not require mitigation measures. Based on information in the Final EIR, the Board of Trustees finds that based upon substantial evidence in the record, the following impacts have been determined to be less than significant:

- Aesthetic impacts
- Air quality impacts
- Greenhouse gas impacts
- Historic resource impacts (only project impacts on the Parkmerced Historic District and the Parkmerced Remnant Historic District, and cumulative impacts on the Parkmerced Historic District)
- Transportation impacts

Aesthetics Impacts

Summary of Aesthetic Impacts

The Project would have less-than-significant impacts related to scenic vistas, scenic resources, visual character of the campus and adjacent Parkmerced area, and light and glare (see Final EIR Section 4.1, Aesthetics). The Project incorporates previously adopted CMP EIR mitigation measures. Specifically, the Project includes design guidelines that would apply to Project

development to ensure compatibility with the adjacent Parkmerced complex, as specified in CMP EIR Mitigation AES-3. The Project also includes the 2007 CMP lighting standards that require Leadership in Energy and Environmental Design for New Construction (LEED-NC) guidelines for light pollution reduction be followed, as specified in CMP EIR Mitigation AES-4A.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to the Project's aesthetics are less than significant. No new significant impacts or increases in the severity of impacts previously identified in the CMP EIR would occur and no additional mitigation measures are required.

Air Quality Impacts

Summary of Air Quality Impacts

The Project would have less-than-significant impacts related to violations of air quality standards, conflicts with the applicable air quality plan, exposure of sensitive receptors to substantial pollutant concentrations, objectionable odors, and cumulative impacts (see Final EIR Section 4.2, Air Quality). The Project incorporates previously adopted CMP EIR mitigation measures. Specifically, the Project would be required to comply with the Bay Area Air Quality Management District best management practices to control dust emissions generated during earthwork activities, as specified in CMP Mitigation AIR-1. CMP Mitigation AIR-2A and Mitigation AIR-2B, involving coordination with the Association of Bay Area Governments and the Bay Area Air Quality Management District to ensure that campus growth and emissions are accounted for in population forecasts and emissions inventories, are also included in the Project and implemented campus wide.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to the Project's air pollutant emissions and related effects are less than significant. No new significant impacts or increases in the severity of impacts previously identified in the CMP EIR would occur and no additional mitigation measures are required.

Greenhouse Gas Impacts

Summary of Greenhouse Gas (GHG) Impacts

The Project would have less-than-significant impacts related to greenhouse gas emissions. Specifically, the Project would not generate GHG emissions, either directly or indirectly, that

may have a significant impact on the environment and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (see Final EIR Section 4.3, Greenhouse Gas Emissions). There are no CMP EIR mitigation measures included in the Project that address GHG emissions. The CMP EIR did not analyze potential campus-wide impacts related to GHG emissions, as Appendix G of the CEQA Guidelines at that time did not address GHG emissions and there were no established thresholds.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to the Project's GHG emissions are less than significant and no mitigation measures are required.

Historic Resource Impacts

Summary of Historic Resources Impacts

The Project would have less-than-significant project impacts related to the Parkmerced Historic District and the Parkmerced Remnant Historic District, and less-than-significant cumulative impacts on the Parkmerced Historic District (see Final EIR Section 4.4, Historic Resources). The Project incorporates previously adopted CMP EIR mitigation measures. Specifically, CMP Mitigations CULT-2A through CULT-2C, requiring identification and evaluation of potentially historic structures, were implemented as part of the preparation of the Final EIR for the Project. See Section 3.2 above for the one new significant unavoidable cumulative impact of the Project, which relates the Parkmerced Remnant Historic District.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to the Project's above historic resource effects are less than significant. No new significant impacts or increases in the severity of impacts previously identified in the CMP EIR would occur and no additional mitigation measures are required for the above historic resources effects. See Section 3.2 above for the one new significant unavoidable cumulative impact of the Project, which relates the Parkmerced Remnant Historic District.

Transportation Impacts

Summary of Transportation Impacts

The Project would have less-than-significant impacts related to level of service, transit services, creation of hazardous conditions for pedestrians and bicyclists, and conflicts with any adopted

plans, policies, or programs supporting alternative transportation (see Final EIR Section 4.5, Transportation). The Project incorporates previously adopted CMP EIR mitigation measures. Specifically, CMP Mitigations TRA-1 and TRA-2, requiring SF State to contribute to identified off-campus improvements if certain mitigation triggers are met, are also included in the Project and implemented campus wide.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to the Project's transportation effects are less than significant. No new significant impacts or increases in the severity of impacts previously identified in the CMP EIR would occur and no additional mitigation measures are required.

3.5 Other CMP Environmental Effects

This section identifies impacts of the Project that were adequately addressed in the CMP EIR and Tiered IS and did not require additional analysis in the Final EIR. Based on information in the Tiered IS (Final EIR Appendix A), the Board of Trustees finds that based upon substantial evidence in the record, the following impacts have been adequately addressed in the CMP EIR and Tiered IS: agriculture and forestry resources; biological resources; cultural resources (including archeological and paleontological resources, human remains, and tribal cultural resources); geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning; mineral resources; noise; population and housing; public services; recreation; and utilities and service systems. No new significant impacts or an increase in the severity of impacts previously identified in the CMP EIR would occur in these impact categories.

Previously adopted CMP mitigation measures that apply to the above topics are already being implemented as part of the CMP, the certified CMP EIR, and the Project and therefore they are considered to be part of the Project, as described in Final EIR Chapter 3, Project Description. The applicable mitigation measures from the CMP MMRP are included in the Tiered IS (Final EIR Appendix A, Attachment A-1).

4.0 Findings That Make Alternatives Analyzed in the Final EIR Infeasible

The analysis of alternatives to the Project is found in Chapter 6, Alternatives of the Final EIR. Based on the analysis and the entire record, the Board of Trustees finds as follows:

4.1 No Project Alternative – Development under Adopted Campus Master Plan

Under this No Project Alternative (Development under Approved Campus Master Plan), the campus would continue to operate and develop under the adopted 2007 CMP, as amended most recently in early 2014. Under this No Project Alternative, the proposed Master Plan map revisions being considered as part of the Project would not be approved. The adopted Master Plan map would allow for the Creative Arts replacement building and the School of Music and Dance building to be constructed on the Block I portion of the Project site. The adopted Master Plan map would allow for housing to be built on Block 5, but no new development would be allowed on Block 6. Therefore, under this alternative, SF State could pursue housing on Block 5 only, with a similar number of housing units, but no retail or student support space would be included.

This alternative would not meet any of the objectives related to the concert hall, as the concert hall would not be built on Block I under the existing Master Plan map and, therefore, would not be developed under this alternative. While the concert hall could be built on the West Campus Green in the future, based on the existing approved Master Plan map, this alternative would not provide for the most efficient and effective use of the West Campus Green and the Tapia Triangle (Block I) for all of the planned future Creative Arts programs. The alternative would only partially meet most of the other Project objectives as it would not make the most efficient use of more recently acquired properties along the southern edge of campus, would be located further away from the M-line, would not include retail and student support uses, and would not help to redefine Holloway Avenue as a “college main street.” The Board of Trustees therefore finds this alternative infeasible.

4.2 No Project Alternative – No New Development/Preservation

Under this No Project Alternative (No New Development/Preservation), the campus would not pursue redevelopment on the Project site in the foreseeable future. SF State has been reusing the properties in UPS, including the Project site, since their purchase in 2000 and 2005. SF State has conducted rehabilitation and maintenance activities on former Parkmerced blocks in this area of campus to prevent disrepair and degradation of existing buildings. These activities would continue under this alternative, but no rehabilitation, demolition, or construction would occur.

This alternative would not meet any of the Project objectives, as the Project would not be implemented under this alternative and no other development would take place on the Project site. The Board of Trustees therefore finds this alternative infeasible.

4.3 Reduced Project Alternative – Partial Reuse/Preservation

This alternative considers whether further reuse and rehabilitation of all or some of the buildings on Blocks 1 and 6 could be completed in compliance with the “Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings” (Weeks and Grimmer 1995), while still meeting some of the primary Project objectives.

The former Parkmerced buildings are not flexible for reuse and rehabilitation, in conformance with the Secretary of the Interior’s Standards, for the numerous reasons. In particular, the Block 1 buildings cannot be rehabilitated for academic purposes as the existing footprint (floor plates) and vertical floor-to-floor heights are more appropriately sized for residential use and not suitable for classrooms or other instructional spaces. Given that, the Partial Reuse/Preservation Alternative would not consider rehabilitation of the existing residential buildings on Block 1 for the proposed academic uses. The alternative would include the Creative Arts replacement building and concert hall on Block 1, as planned for the Project. The proposed Master Plan map revision would also be implemented under this alternative to allow for the location of the above uses on Block 1 and for the student housing/mixed-use building on Block 6.

On Block 6, this alternative would consider the possibility of retaining a portion of the existing garden apartments and courtyard and developing a multi-story building on the remainder of the site. The alternative would retain the existing apartment buildings on the north and west sides of the block to provide for continued continuity with the rest of the Parkmerced Remnant Historic District to the west. The remainder of the block facing east and away from the remnant district would be redeveloped with a student housing/mixed-use building. The building

would be limited to no more than four stories for compatibility with the existing buildings to be retained. Given the limited horizontal and vertical building area, the student housing beds, and retail and support space would be reduced substantially.

This alternative would only somewhat meet the Project objectives related to the student housing/mixed-use building site as it would substantially reduce the number of housing units and beds that could be constructed on the site and therefore the alternative would be limited in aiding in the recruitment and retention of students and reducing commute trips by providing close-in housing. A partial reuse/preservation alternative would not integrate Block 6 into the campus and would not make efficient use of this site. Given that the housing and retail would not face Holloway Avenue, the alternative would not facilitate redefining Holloway Avenue as a “college main street.” The Board of Trustees therefore finds this alternative infeasible.

4.4 Reduced Project Alternative – No Development on Block 6

Under the Reduced Development Alternative, SF State would not redevelop Block 6 as part of this Project to provide for increased student housing and retail and support space, or pursue the related Master Plan map revision required to develop this block. The proposed development on Block 1, related Master Plan map revision, and the vacation of Tapia Drive would take place under this alternative to meet the primary Project objectives related to Creative Arts facilities, extending the academic core to the west, and positioning semi-public uses such as the concert hall in highly visible locations along the campus edges.

This alternative would not meet the Project objectives related to the student housing/mixed-use building site, as it would not build housing, retail, or support uses and therefore would not aid in the recruitment and retention of students, reduce commute trips, integrate Block 6 into the campus, make efficient use of Block 6, and would not facilitate redefining Holloway Avenue as a “college main street.” The Board of Trustees therefore finds this alternative infeasible.

4.5 Alternative Site Location – Avoidance of Former Parkmerced Properties

Alternative Site Locations considered for the Project include (1) the West Campus Green, adjacent to Block 1, for the Creative Arts replacement building and concert hall, and (2) a site in UPN on the north of the campus for the student housing/mixed-use building. A site in UPN is considered given that the 2007 CMP also called for the redevelopment of UPN and the redevelopment of Buckingham Way into a campus main street, similar to that contemplated for Holloway Avenue. A location in UPN does not provide for a direct, proximate connection to the campus core. Therefore, development on this site would likely also require the construction of the Millennium Bridge across the valley, which would connect UPN to the

academic core, as called for in the 2007 CMP. This alternative would avoid redevelopment of former Parkmerced properties located in Block 1 and Block 6.

This alternative would not provide for the most efficient and effective use of the West Campus Green and the Tapia Triangle (Block 1) for all of the planned future Creative Arts programs. This alternative would not meet the Project objective that aims to integrate and make efficient use of more recently acquired properties along the southern edge of campus, as the Project would be pursued in the northern portion of the campus. As the student housing/mixed-use building would be located further away from the M-line, it would only partially meet the objective to locate new student housing, neighborhood retail, and support services in proximity to the existing Muni M line and bus lines and to the future planned underground Muni M line and station and to planned 19th Avenue bicycle and pedestrian facilities. Given that the building would be on the north side of the campus, it would not meet the objective to locate the building in immediate proximity to the academic core of the campus, where pedestrian access to the core is readily available. As noted above, a new pedestrian bridge would be required to provide for direct access to the academic core. The alternative would not facilitate redefining Holloway Avenue as a “college main street.” The Board of Trustees therefore finds this alternative infeasible.

5.0 Findings With Respect to Mitigation of Significant Adverse Impacts, and Adoption of Mitigation Monitoring and Reporting Program

Based on the entire record before the Board of Trustees, and having considered the unavoidable significant impact of the Project, the Board of Trustees hereby determines that all feasible mitigation within the responsibility and jurisdiction of the University has been adopted to reduce or avoid the unavoidable significant impact identified in the Final EIR, and that no additional feasible mitigation is available to further reduce the significant impact. The feasible Project mitigation measure is discussed in Section 3.2, above, and is set forth in the Project MMRP. Section 21081.6 of the Public Resources Code requires the Board of Trustees to adopt a monitoring or compliance program regarding the changes in the Project and mitigation measures imposed to lessen or avoid significant effects on the environment. The MMRP for the Creative Arts & Holloway Mixed-Use Project is hereby adopted by the Board of Trustees because it fulfills the CEQA mitigation monitoring requirements:

- The Project MMRP is designed to ensure compliance with the changes in the Project and the mitigation measure imposed on the Project during Project implementation; and

- Measures to mitigate or avoid significant effects on the environment are fully enforceable through conditions of approval, permit conditions, agreements, or other measures.

STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological or other benefits of the project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological or other benefits of the project outweigh the unavoidable adverse environmental effects, those effects may be considered "acceptable" (CEQA Guidelines 15093(a)). CEQA requires the agency to state, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (CEQA Guidelines 15093(b)).

In accordance with the requirements of CEQA and the CEQA Guidelines, the Board of Trustees finds that the mitigation measure identified in the Final EIR and the Project Mitigation Monitoring & Reporting Program, when implemented, will avoid or substantially lessen the new significant effect identified in the Focused Tiered Final EIR for the San Francisco State University Creative Arts & Holloway Mixed-Use Project. However, the significant cumulative impact of the Project on the Parkmerced Remnant Historic District is unavoidable even after incorporation of the feasible mitigation measure. The Final EIR provides detailed information regarding the historic resource impacts of the Project. The Board of Trustees finds that the feasible mitigation measure identified in the Final EIR within the purview of the University will be implemented with the Project, and that the remaining significant unavoidable effect is outweighed and found to be acceptable due to the following specific overriding economic, legal, social, technological, or other benefits based upon the facts set forth above, the Final EIR, and the record, as follows:

1. Replacing significant portions of the existing Creative Arts building, which has various deficiencies and no longer supports the academic program.
2. Constructing a new concert hall with recording and broadcast capability to provide hands-on learning for students and to support SF State and community programs.
3. Reinforcing the academic core and extending it westward to create a contiguous, uninterrupted academic core.
4. Locating the concert hall at the edge of campus to help redefine SF State's external identity and to engage the larger community.
5. Providing new on-campus student housing to aid in recruitment and retention of students. Enhancing the provision of student housing on campus increases students' academic success and improves graduation rates.

6. Providing new on-campus student housing to accommodate the strong student demand for on-campus housing.
7. Providing close-in housing that enables students to walk to school, thereby reducing commute trips to campus, vehicle miles traveled (VMT), and associated GHG emissions.
8. Locating higher-density student housing with ground-floor neighborhood retail and services along Holloway Avenue to redefine Holloway Avenue as a “college main street.”

Considering all factors, the Board of Trustees finds that there are specific economic, legal, social, technological and other considerations associated with the Project that outweigh the Project's significant unavoidable effect, and the adverse effect is therefore considered acceptable.