April 2, 2007

Mr. Richard Macias
California State University Board of Trustees
1600 Holloway Avenue
San Francisco, CA 94132

Dear Mr. Macias:

San Francisco State University Master Plan Update – Draft Environmental Impact Report

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review for the proposed San Francisco State University Master Plan Update. The comments presented below are based on our review of the Draft Environmental Impact Report (DEIR).

Is trip generation for this study developed using full-time equivalent (FTE) students? It is not clear based on our review of the DEIR. The discussion of trip generation in section 4.11 on Traffic, Circulation, and Parking is silent on whether or not FTE was used. On the other hand, chapter 3 discusses enrollment in terms of FTE. If FTE was indeed used to develop the trip generation, we believe that this approach is inappropriate with respect to the traffic impact study because it would result in an underestimation of generated trips.

The Hotel trip generation rate used for the daily trips is lower than the Institute of Transportation Engineers Trip Generation Manual (7th edition) standard rate in Table 4.11-5. The total daily trips and total PM peak hour trips are incorrectly calculated, therefore the net new trips are also incorrectly calculated.

By 2020, this proposed project will create 5260 daily trips and around 470 PM peak hour trips (see Table 4.11-5). It is hard to believe that the Year 2020 With Project Conditions is so close to the Year 2020 Without Project Conditions (see Table 4.11-9). This means, all other projects not including the proposed project should be responsible for the future trip generation.

The overall intersection level of service, delay, and vehicles/capacity are the measures of effectiveness (MOE) used to represent the results of the intersection analysis for each intersection evaluated. Overall intersection MOE alone do not adequately describe the expected operation at

"Caltrans improves mobility across California"
an intersection. We recommend that these intersection MOEs be shown for each approach of each intersection.

In addition to the activities listed in Section 4.11.2 under Impacts and Mitigation Measures, we suggest offering new classes during the evening and on weekends to help alleviate traffic congestion due to the growth in student population.

Should you require further information or have any questions regarding this letter, please call Lisa Carboni at (510) 622-5491.

Sincerely,

TIMOTHY C. UNABLE
District Branch Chief
IGR/CEQA

c: Scott Morgan (State Clearinghouse)
Response to Comment Letter 1

Response to Comment 1-1. The trip generation was developed using headcounts (HC) as documented in footnote “a” of Table 4.11-5 of the Draft Environmental Impact Report (Draft EIR). Please also refer to Master Response 10, Campus Population Growth Evaluated in the Draft EIR.

Response to Comment 1-2. The additional trips from the conference center/hotel were projected in the Draft EIR based on the Transportation Impact Analysis Guidelines for City and County of San Francisco, as indicated in footnote “b” of Table 4.11-5 of the Draft EIR. The City and County hotel trip generation rate for the peak hour is the same as that provided in the ITE Trip Generation Manual, 7th Edition published by Institute of Transportation Engineers (see Land Use 310). It should also be noted that the above noted ITE rate is inclusive of banquet and convention facilities.

Additionally, the daily and PM peak hour trips for the hotel were correctly calculated in Table 4.11-5 (Draft EIR page 4.11-15). As indicated in footnote “b” the trip generation is based on 90 percent occupancy for 250 rooms. Please also see Master Response 2, Need for a Conference Center, and Master Response 15, Transportation Impacts, which indicate that the Conference Center/Hotel originally contemplated in the draft Campus Master Plan (January 2007) has been substantially scaled-back in size in the final Campus Master Plan (July 2007). See Chapter 2, Project Refinements, for further information.

Response to Comment 1-3. As indicated on Draft EIR pages 4.11-15 and 4.11-16, the 2020 without project conditions was based on applying a growth factor of 1 percent per year to the existing peak hour turning movement volumes at the study intersections per “Transportation Impact Analysis Guidelines,” published by City and County of San Francisco. In addition to the growth in general background traffic, peak hour trips from approved and pending projects were estimated and added to the projected 2020 peak hour turning movement volumes. The list of approved and pending projects in the vicinity of the project was provided by the City and County of San Francisco. The approved and pending projects included in the 2020 proposed trip generation are summarized in Draft EIR Table 4.11-7 (and revised in the Final EIR, Chapter 3, Changes to the Draft EIR). (See further discussion below about the revisions to the analysis made in the Final EIR.) It is estimated that the approved and pending projects will generate approximately 2,077 daily trips with 298 occurring during the PM peak hour, in addition to the growth in general background traffic. Revised Table 4.11-10 (see Chapter 3, Changes to the Draft EIR), illustrates the project’s contribution to the net increase and total intersection volumes. As would be expected, the project would constitute a larger share of traffic on the Lake Merced Boulevard intersections, as compared to the 19th Avenue and Junipero Serra Boulevard intersections, which experience major commuter and visitor traffic.
The results of the level of service analysis are summarized in Draft EIR Tables 4.11-9 and 4.11-10 (see revised Table 4.11-9 and 4.11-10 in Chapter 3, Changes to the Draft EIR), which illustrate that the three most affected intersections consist of the main entrances to the campus, including Lake Merced Boulevard/Font Boulevard, Lake Merced Boulevard/South State Drive, and 19th Avenue/Holloway Avenue. As illustrated in those tables, two of these intersections (Lake Merced Boulevard/Font Boulevard and Lake Merced Boulevard/South State Drive) are projected to exceed the significance thresholds identified in the Draft EIR in Scenario 2 (see page 4.11-13 through –14). Mitigation measures are identified in the Draft EIR to mitigate these significant impacts (see Impact TRA-1). The intersection of 19th Avenue/Holloway Avenue is projected to operate at unacceptable levels of service under both Year 2020 without and with Project Conditions. The additional trips under Project Conditions are projected to increase the average delay at the intersection by approximately 47 seconds per vehicle and volume-to-capacity ratio by approximately 0.37, however the intersection is projected not to exceed the significance thresholds. Further, the addition of traffic from campus growth is projected to increase the average delay and volume-to-capacity ratios at all study intersections as illustrated in Table 4.11-9, however it is projected that the significance thresholds will not be exceeded, except as identified above.

It should also be noted that the Year 2020 conditions with and without the project were reanalyzed as part of this Final EIR to account for the reduced size of the proposed 77 Cambon project that was considered in the Year 2020 without Project conditions. This analysis confirms the findings of the Draft EIR, as the proposed project would continue to exceed the significance thresholds at only the two intersections identified above. Please refer to Response to Comment 12-3 for additional information about this additional level of service analysis. Please also refer to Chapter 3, Changes to the Draft EIR, for revised Tables 4.11-7 through 4.11-10.

Response to Comment 1-4. The Draft EIR impact analysis was based on the City’s Transportation Impact Analysis Guidelines, which indicate that overall intersection MOE should be the basis for the assessment of impacts and mitigation measures.

Response to Comment 1-5. SF State offers a significant number of classes in the evening hours for the convenience of students who are working. Entire graduate programs, such as the Masters in Business Administration, can be completed in the evening. These evening offerings could be expanded, as long as there are students who would choose to take classes at night and faculty who are able to teach at night. The success of weekend classes over the years has been spottier. In the late 1990s, a concerted push was made to create a "Weekend College" of classes taught primarily on Saturdays. The response from students was tepid at best. Busy students, both traditional 18-22 year olds and nontraditional working adults, seem to prefer to keep weekend hours for their private pursuits.
May 2, 2007

Number of Pages (Incl. Cover Sheet): 25

SENT TO: Richard Macias
SFSU Capital Planning, Design and Construction

Fax No.: 338-2960

FROM: Dean L. Macris
Director of Planning

Fax No.: (415) 558-5409

Phone No.: (415) 558-6411

RE: SFSU Campus Master Plan EIR Comments

Mr. Macias:

Thank you for accepting these comments on the Draft Environmental Impact Report for the San Francisco State University Campus Master Plan, published February 1, 2007.

Attached from:
Director of Planning, San Francisco Planning Department
Honorable Sean Elsbernd, San Francisco Board of Supervisors, District 7
Public Utilities Commission
Municipal Transportation Agency
San Francisco Planning Department, Major Environmental Analysis
City Attorney's Office
March 30, 2007

Mr. Richard Macias
Capital Planning, Design and Construction
San Francisco State University
1600 Holloway Avenue
San Francisco, CA 94132

He: San Francisco State University Campus Master Plan
Draft Environmental Impact Report
(SCH # 2006102050)

Dear Mr. Macias,

The Planning Department applauds SFSU in taking a long-term view of the growth of the San Francisco State University ("SF State") main campus and its relationship to the surrounding communities. Congratulations on completion of your Master Plan. We look forward to working with you to enable the campus's successful development. The Planning Department for the City and County of San Francisco (the "City") provides the attached comments on the recently published Draft EIR in hopes of strengthening the City's partnership with SF State. Forward-looking identification of issues and their analysis will help the University accomplish its educational and institutional objectives for the betterment of San Francisco in general.

To that end, a number of City agencies and individuals have reviewed the Draft EIR and provided their comments to the Planning Department. The comments include many important issues that warrant your consideration. Without going into detail, I have summarized a few principal issues as follows.

As described in the attached comments, it is important for SF State to fully analyze the effects of student housing demand on the City. There is concern that adding at least 6,200 students and faculty will increase pressure on residential areas in close proximity to SF State as well as on the City generally. If our facts are correct, about 10% of the existing student population, and far fewer of SF State employees, live on campus. The proposed campus expansion will result in a net increase of only 848 units of new and converted housing for both students and faculty. The remainder of the additional SF State population will rely on the City and surrounding communities for housing. Particularly as SF State attracts more students from outside the Bay Area, it is critical to conduct an in-depth and reasoned exploration of associated impacts to the City housing stock.

In addition to housing impact issues, the Draft EIR touches on a number of other areas of interest to the City. For example, how would circulation and transit systems be affected by campus development? How would the University work with the City and Caltrans on its idea for campus "Main Streets?" Attached comments by the City and the Municipal Transportation Agency (MTA) raise issues with the Draft EIR's study of transportation impacts that call for serious consideration by SF State. How will off-site impacts to infrastructure, including water, sewer, utilities,
transportation, parking, transit, and housing be addressed and where will the funding for impact mitigation come from? How can SF State best address concerns from members of the public regarding possible biological and historic impacts at Lake Merced and Park Merced?

It is our firm hope that SF State will work with the City to identify and implement mutually beneficial land use policies and improvements. Full and reasoned consideration of the attached comment letters is a key step in developing a good working relationship. We look forward to working with the Cal State system to proactively address off-site impacts to City systems.

The Planning Department and associated City agencies very much appreciate the opportunity to comment on the Draft EIR. Please do not hesitate to call. I can be contacted at (415) 558-6411. Thank you.

Sincerely,

Dean Macris
Director of Planning

Attached: Technical/Agency Comments

cc: Shahnaz Barati, URS Corporation
    Paul Melitzer, Environmental Review Officer
    Dennis Herrera, City Attorney
    Honorable Aaron Peskin, President, Board of Supervisors
    Honorable Sean Elsbernd, Supervisor, District 7
Response to Comment Letter 2

Response to Comment 2-1. Please see Master Response 14, Regional Housing Supply Impacts.

Response to Comment 2-2. Please see Master Response 15, Transportation Impacts, Master Response 8, Local Control Over Campus Land Uses, Master Response 12, Biological Resources Impacts, and Master Response 13, Parkmerced Historical Resource Impacts. Please also see responses to comments contained in Letters 2A through 2F.
March 30, 2007

SEAN R. ELSBERND

Mr. Richard Macias
Capital Planning, Design and Construction
San Francisco State University
1600 Holloway Avenue
San Francisco, CA 94132

Re: Comments on SF State Campus Master Plan Draft EIR

Dear Mr. Macias:

As the immediate, local representative of both San Francisco State University (hereinafter “SFSU”) and the residential neighborhoods surrounding the campus of SFSU, I have taken great interest in the SFSU Master Plan. Let me begin by applauding SFSU’s noble and laudable goal of improving its educational facilities for generations of future Californians. Without question, SFSU has played, and will continue to play an integral role in providing the San Francisco and California economies with educated graduates prepared to address and solve the known and unknown problems of the 21st century. The Master Plan, as drafted, clearly strives to reach this goal.

That being said, there are a few issues of major concern that I have after having reviewed the Draft EIR and after having discussed the Draft EIR with constituents in the surrounding neighborhoods.

First, I am extremely concerned about the lack of financial commitment within the Master Plan for the necessary infrastructure improvements that will undoubtedly be necessary should every piece of this Master Plan go forward. For example, the Draft EIR states that SFSU will assist in lobbying efforts and offer its “fair share” of payments for any necessary transportation mitigation improvements. Recognizing the reality of continual budget shortfalls at the state government level for higher education facilities like SFSU, a mere comment in a Draft EIR fails to inspire much confidence that such commitments to “fair share” contributions are realistic. Moreover, as someone with direct knowledge of San Francisco’s current long term transportation plans, I can assure you that major improvements along the 19th Avenue corridor of the scope spoken of in the Draft EIR are a low priority and not likely to see any local funding anytime soon.

Second, I have grave concerns about the proposed hotel/conference center proposal along 19th Avenue. Without discussing the specific transit and other infrastructure impacts of this proposal, I simply question the appropriateness of such a use in this area. Directly across 19th Avenue from this proposed hotel is a single-family residential neighborhood, Lakeside Village. Additionally, within a two-mile radius are many other single-family residential neighborhoods. The southwest corner of San
Francisco may be home to SFSU, but it is also home to thousands of San Franciscans who enjoy the quality of life afforded to them through their residency in single-family neighborhoods. A hotel/conference center would never be permitted in these neighborhoods by local authorities if the proposal was on land over which we had jurisdiction as we are well aware it would be an incompatible use and would threaten the quality of life of the surrounding neighbors.

Third, the “main street” type proposal along Holloway raises a number of questions and concerns for the existing non-SFSU tenants of the rental units. As you are well aware, these parcels were purchased by SFSU, and through attrition of pre-existing tenants, are made available to SFSU students and faculty. There remain, however, a number of pre-existing tenants with no plans to leave. Their housing needs during construction and subsequent to construction must be a primary priority for the Master Plan.

Fourth, during my two and half years representing SFSU and its surrounding communities, I have spent a great deal of time working with SFSU on helping it improve its existing relationship with the surrounding community. Such assistance was as simple as addressing the existing parking impact SFSU already imposes on the surrounding neighborhood to the more nebulous nuisance issues of litter and noise within the Villas at Panhandle. These pre-existing impacts are not adequately addressed in the Draft EIR, thus providing an inappropriate baseline for discussion of future, new impacts.

Fifth, as to the aforementioned parking issue, SFSU already, without the Master Plan, is the largest contributor to the horrendous parking conditions within the immediate neighborhoods. The proposals contained within the Draft EIR not only fail to truly address the proposed growth called for in the Master Plan, but also absolutely fail to address the existing problem. One simple suggestion I would make to the California State University Trustees is to adjust the current cost charged ($0.00 to $0.75 per day) to staff and faculty members to park on campus. Such low pricing does very little to incentivize people to use public transportation.

In conclusion, as a member of the San Francisco Board of Supervisors, I am often called on to weigh the adequacy, completeness, and objectivity of certified EIR’s for projects within the City’s jurisdiction. If the SFSU Master Plan Draft EIR arrived on my desk for approval, I could not in good conscience find the EIR accurate or complete. I strongly urge you to heed my concerns, the concerns articulated by our City’s Planning Department and our City Attorney, and most importantly, the concerns raised by SFSU’s residential neighbors.

Sincerely,

[Signature]

Supervisor Sean R. Elsbernd
Response to Comment Letter 2A

Response to Comment 2A-1. Please see Master Response 15, *Transportation Impacts*. Please also see Response to Comment 2E-24.

Response to Comment 2A-2. Please see Master Response 3, *Need for a New Conference Center*, which indicates that the proposed Conference Center and guest accommodations have been substantially scaled back in size.

Response to Comment 2A-3. Please see Master Response 14, *Regional Housing Supply Impacts*, for a response to this comment. In particular, refer to the subsection called “Displacement of People.”


Additionally, under the Campus Master Plan, it is anticipated that parking fees will increase for all users. The extent of the fee increase will depend upon a variety of unknown factors, including the future cost of parking construction, the impact of proposed transit improvements on parking demand and pace of population increase as well as collective bargaining. Future fee increases will likely continue to vary according to university affiliation and other factors.

Response to Comment 2A-6. Comment noted. See Section 4.2, *Master Responses* for an overview of the responses to public comments raised during the public review period of the Draft EIR.
March 23, 2007

San Francisco State University
Capital Planning, Design and Construction
1600 Holloway Ave.
San Francisco, CA 94132

Attn: Richard Macias

Subject: SFSU Campus Master Plan DEIR

Ladies and Gentlemen:

Thank you for the opportunity to comment on the SFSU Campus Master Plan DEIR, SCH # 2006102050. Both the Wastewater and Water Enterprises of the San Francisco Public Utilities Commission have comments on the DEIR. The comments are listed separately below:

Water Enterprise Comments

As outlined in the following proposed mitigation measures in the Draft EIR, the SFPUC expects that it will be consulted on two SFSU expansion activities:

- Mitigation BIO-1A (Sect 4.3.2.3) – Consultation with the SFPUC for new path connection and new seasonal creek in the East Lake area.

- Mitigation BIO-2B (Sect 4.3.2.3) – Consultation with the SFPUC for signage and design features to be installed.

Potable Water Supply & Potable Water Distribution Capacity

- The SFPUC confirms that it provides water at two points of connection located in 19th Avenue and Lake Merced Blvd, and that these two connections have the capacity to deliver up to the estimated 400,000 gallons per day (gpd) of water supply (additional 100,000 gpd from present deliveries estimated at 300,000 gpd). The SFPUC has not confirmed, however, if the capacity is adequate to provide for fire flows on top of the potable water deliveries. This should to be verified through the Fire Department by SFSU.

- The SFPUC supports the CSU Water Conservation Policy outlined in Section 4.12.1.11 and implementation of Best Management Practices (BMPs) in water conservation. That includes maximizing landscaping efficiency, efficient design in new developments and retrofits of existing devices and processes. The SFPUC offers a variety of conservation programs that include technical
and financial support that may be available to SFSU for implementation of conservation best management practices. The SFPUC has had some discussions with SFSU on water conservation programs and encourages SFSU to consider joint opportunities with the SFPUC to maximize efficiency on the campus both in existing and planned development.

**Recycled Water Use**

- According to Section 4.12.2.3, water demand associated with irrigation use is not expected to increase appreciably, as the campus is already developed and the amount of irrigated landscaping is not expected to increase substantially. However, the SFPUC is currently planning to supply SFSU with recycled water for irrigation use as part of its Recycled Water Project currently scheduled to come on line in September 2012. The SFPUC Recycled Water Project expects to serve SFSU with 0.16 million gallons per day (mgd), which includes 0.09 mgd for irrigation and 0.07 mgd for commercial use. The SFPUC assumes that SFSU has incorporated this supply into its projected future potable demand and encourages SFSU to contact us if additional recycled water use opportunities are identified.

**Runoff into Lake Merced**

- Mitigation HYDRO-1 (Section 4.7.2.3) – Suggest revising mitigation measure to include “alteration of fertilizer use to offset nutrient load”.

- Impact HYDRO-2 (Section 4.7.2.3) – Report suggests impact is less than significant and no mitigation required. However, the language of the DEIR is not adequate to determine that the impact is less than significant. For example, how is the water quality being assessed for the new runoff generated that previously went into the storm drain system? The DEIR states that this new runoff will infiltrate, evaporate, or discharge directly into Lake Merced, which could impact water quality in the groundwater basin and/or Lake Merced. This is a potentially significant impact to water quality that doesn’t seem to be addressed.

**Section 4.12.1.2 Water Supply**

- “Currently the system delivers an annual average of about 267 mgd to its customers…” - Change 267 mgd to 265 mgd (UWMP 2005 reference, p. 11)
Wastewater Enterprise Comments

The DEIR states there will be a one-third increase in wastewater generation from the proposed improvements, approximately 50,000 gallons per day, and that mitigation is not required as impacts will not be significant. However, to establish this claim, the DEIR should include complete documentation of this increase, including peak flows and volumes, anticipated water quality based on the source of storm water. The SFPUC is concerned that this increase, however large it may be, could be both adverse and significant. Therefore, additional information is needed to verify the 50,000-gpd figure. While sewer lines adjacent to the campus may be able to accommodate the proposed increase during dry weather, this may not be the case during wet weather. The proposed increase during storm events could cause flooding on campus or in nearby neighborhoods from overloaded combined sewer lines. This possibility should be thoroughly analyzed in the DEIR. The effects of increased flows, during dry or wet weather, at the Oceanside Treatment Plant should also be analyzed in the document.

Furthermore, it is not appropriate under CEQA to state that, because SFPUC can charge SFSU to offset impacts to its system, campus plan impacts are insignificant. The purpose of a DEIR is to evaluate the significance of an impact to the surrounding environment. The potential involvement of a third party does not reduce the responsibility of the project sponsor to evaluate and propose mitigation for potential environmental impacts. In this case, SFSU should identify all the potential impacts to the SFPUC combined sewer system from the proposed campus expansion, analyze the effects of those impacts, and propose offsetting mitigation. SFSU cannot defer its impact analysis and proposed mitigation measures to undefined, potential future SFPUC actions.

For example, SFSU could reduce its impacts on the SFPUC sewer system through adoption of a no-net increase discharge policy. The SFPUC believes it is appropriate for SFSU, as it is for other new development in San Francisco, to incorporate such a policy in its campus planning and in its environmental review of that planning. If SFSU currently disposes 150,000 gpd to the SFPUC sewer system, the proposed campus master plan, and the environmental review of that plan, should include means by which this amount would not increase, despite increased use and development on the campus.

A no-net increase discharge goal could be met through a reduction of current runoff or ground water flow to the sewers sufficient to offset increased sewage flows, so the 150,000-gpd amount is not exceeded. SFSU could achieve such a goal through a
variety of methods, the environmental effects of which, of course, should also be considered in the EIR. These methods include:

- Disconnecting downspouts and directing drainage to cisterns or rain gardens
- Prohibiting sump pumps from discharging to the sewers
- Integrating low impact design principles throughout campus drainage plans to reduce the storm water runoff coefficient and reduce peak flows
- Replacing existing or proposed roofs with "ecroofs," installing pervious parking areas, creating bioretention swales, all to minimize storm flows to sewers

Thank you for the opportunity to comment on this DEIR. The comments are combined from several reviewers. Should the project sponsor or the environmental review team wishes to discuss these comments further, please call me at 551-4529 and I will arrange contact with the appropriate person.

Very truly yours,

Robert B. Hickman

SPSU DEIR comments 3/2007

cc. Leigh Kienker, MEA Planning
    Heather Pohl, SFPUC Water
    Rosey Jencks, SFPUC Wastewater
    EIR Comment File
Response to Comment Letter 2B

Response to Comment 2B-1. Comment noted.

Response to Comment 2B-2. As indicated in the Draft EIR (page 4.12-2), the City and County of San Francisco Public Utilities Commission (PUC) supplies water to the campus at two points of connection, located in 19th Avenue and Lake Merced Boulevard, which are equipped with turbine meters to maximize available water flow and pressure. Within the boundaries of the SF State campus, beyond these points of connection with the City’s system, the University has its own water system. The SF State campus water system is unusual in that while it has two different onsite water systems, one for fire and one for domestic and irrigation water, they are interconnected to each other and served by the same connections to the public water supply. This onsite distribution system is made up of 6- and 8-inch piping and forms two interconnecting loops (the upper loop for academic buildings, and the lower loop for residential buildings) with isolation valves so portions of the system can be shut down for repairs as needed. In 1997 a second loop of 8-inch piping dedicated to fire water was constructed around the academic core. All hydrants and fire services in this area were shifted to the new system. The remaining residential buildings are still served by the single interconnected system for both fire and domestic services. Back-flow preventers are provided on the combined water supply system.

According to the Campus Master Plan Existing Conditions Analysis (WRT, 2006), while no major upgrades to the campus water system are known to be needed at this time, it is possible that if a given building has a substantially larger flow requirement than existing development, upsizing of existing campus piping may be required. Given the pressure and flow provided by the turbine meters, however, improvements to the off-campus system to provide for adequate fire flows are not anticipated. See Chapter 3, Changes to the Draft EIR, for revised language related to fire water. Please also see Master Response 16, Water and Wastewater Impacts. Please also see Chapter 3, Changes to the Draft EIR, for revisions to the analysis that reflect the above.

Response to Comment 2B-3. This comment concerns joint opportunities between SFPUC and SF State to conserve water. SF State is in contact with the SFPUC regarding future recycled water use, and is planning this summer to study the possibility of rainfall/storm drainage catchments and impoundments as an alternate source of irrigation and utility water. The new development as outlined in the Campus Master Plan will occur in a manner consistent with CSU sustainability goals including water conservation. Existing water conservation programs are described on Draft EIR page 4.12-8. While specific project standards have not yet been determined, the use of low-flow devices and a reduction in irrigation demand are a given. Further study is required to determine the specific combination of replacement/retrofit of existing devices (e.g., sink faucets, shower heads, toilets) and changes in planting to reduce irrigation demand to meet those goals. It should be noted that the Campus Master Plan calls for further study regarding landscape maintenance guidelines, which would include Best Management Practices (see Campus Master Plan page 121).

Response to Comment 2B-4. If and when recycled water becomes available, the campus irrigation system would need some improvements to create a completely separate system, as it is now interconnected to the domestic water system. The use of recycled water would reduce the potable water
usage on the campus. However, further study and landscape design would need to be completed to estimate the ultimate reduction in potable water demand associated with the provision of recycled water.

Response to Comment 2B-5. Mitigation HYDRO-1 has been revised in accordance with this comment. Please see Chapter 3, Changes to the Draft EIR, for the revised text of this measure.

Response to Comment 2B-6. To clarify surface water and groundwater quality issues associated with the proposed Campus Master Plan, text has been revised in Impacts HYDRO-1 and HYDRO-2. See Chapter 3, Changes to the Draft EIR, for the revised text.

Response to Comment 2B-7. Text has been revised in response to this comment. See Chapter 3, Changes to the Draft EIR, for the revised text.

Response to Comment 2B-8. Text has been revised in response to this comment. See Chapter 3, Changes to the Draft EIR, for the revised text.

Response to Comment 2B-9. This comment recommends that SF State reduce impacts to the San Francisco’s combined sewer system by adopting a no-net increase in discharge policy. The SFPUC’s suggested methods for reduction of runoff with the goal of achieving no-net increase in discharge are consistent with the proposed approach put forth in the final Campus Master Plan.

As indicated in Chapter 2, Project Refinements, additional analysis was performed by Wallace Roberts & Todd and their subconsultants as the basis for confirming that Campus Master Plan development will not increase the City’s combined sewer wet weather flows. According to the final Campus Master Plan, development will cause an approximate 2 percent increase in annual storm runoff from new building areas. Annual storm run-off was calculated using annual precipitation data for the San Francisco area. The final Campus Master Plan provides revised estimates of the quantity of storm runoff directed to the combined sewer system. Due to the new open storm water system (see description below) the quantity of storm runoff directed to the combined sewer system will be decreased by approximately 20 percent, for a net reduction of 18 percent from the runoff rate and quantity of the existing campus.

The Campus Master Plan includes the following components, which would serve to reduce storm water runoff directed to the City’s system:

• Three-tiered open system consisting of low impact development concepts, which will filter and percolate storm runoff through the campus using surface swales to convey runoff to Lake Merced, thereby reducing the quantity of storm runoff that enters the public system for treatment. As described on Draft EIR page 4.7-5, the system would include the use of rain gardens and small infiltration devices located immediately adjacent to developed parcels, distributed infiltration/conveyance areas and bioswales that would infiltrate and treat runoff, retention/detention facilities to control peak flows, and a newly constructed creek to Lake Merced which would allow for the discharge of stormwater that does not otherwise infiltrate in the system (see Draft EIR Figure 3-9, Storm Water Management System).

• Architectural and urban design guidelines that call for green roofs, which would allow for the reduction of heating and cooling loads and stormwater runoff (see Draft EIR page 3-15).
• The use of porous paving will be investigated for each project and used if appropriate. Additionally, the use of unit pavers placed on a porous setting bed to achieve some limited porosity, will also be considered (see Chapter 2, Project Refinements).

These measures encompass most of the recommended approaches identified in this comment for reducing storm water discharge. See Draft EIR Chapter 3, Project Description and Final EIR Chapter 2, Project Refinements, for further information about these project components. It should also be noted that the Campus Master Plan maintains the existing pattern of open space on the campus and focuses new development on existing building or parking lot sites. Therefore, the overall increase in stormwater runoff from the project is minimized to the extent possible, and increases in impervious surfacing will be minimized.

The net reduction of 18 percent in runoff entering the storm drain system has the additional benefit of offsetting the increase in sanitary sewer volume due to new buildings on campus; thus Campus Master Plan development will not increase the City’s combined sewer wet weather flow at buildout. The related follow-on studies identified in the final Campus Master Plan will seek to determine how the development specifically will meet a “net zero” increase in combined sewer wet-weather flows incrementally, as each individual building and phase is implemented. In particular, the Integrated Stormwater Management Master Plan, the Infrastructure Master Plan, and the Utility Capacity/Sizing Analysis will aid in making these determinations.

While a net zero can be achieved during wet weather conditions, there would still be a net increase in wastewater flows during dry weather conditions. As indicated in Impact UTL-2 (Draft EIR page 4.12-12), wastewater generation will increase by about 50,000 gpd. While these flows could not be offset by storm water flows during dry weather, they are not expected to result in system capacity problems, as these dry weather flows would fall well within the total capacity of the existing combined system, which is based on wet weather conditions. Further, the City has indicated that sewer lines on Font Boulevard and Holloway Avenue and further downstream may need to be enlarged to accommodate higher combined peak wet weather flows (Shrestha, 2007). As the campus is planning to meet a net zero increase in combined flows both over the long term and incrementally, off-site improvements to the downstream sewer system should not be required. While significant impacts to the physical environment have not been identified, a mitigation measure has been developed to ensure that the campus verifies its ability to achieve the net zero goal on a project-by-project basis and will coordinate with the SFPUC is this regard. Please see Chapter 3, Changes to the Draft EIR, for revised impact language and new mitigation measure. Please also see Master Response 16, Water and Wastewater Impacts.
March 29, 2007

Richard Macias, Capital Planning
SFSU
1600 Holloway
San Francisco, CA 94132

Dear Mr. Macias:

The Municipal Transportation Agency Muni Service Planning staff have the following comments on the draft EIR for San Francisco State University Campus Master Plan and Enrollment Ceiling Increase to 25,000 FTE.

The project needs to include a mode split table that predicts how the 25,000 new students will travel to and from the campus. Since universities do not generally have standard peak times, this needs to be done by time of day for the worst-case scenario.

Table 4.1.1-11 — Existing Year Muni Conditions, confuses us: "Weekday PM Peak Hours (5-6 PM) indicates that there is sufficient available transit capacity. This table contradicts the statement in Paragraph 4.11.1.6 — Transit Service Issues that Muni does not have available capacity on Lines M and 28. We believe Paragraph 4.11.1.6 is more accurate depiction of existing conditions.

We believe that fairly substantial transit impacts will result from the increase in FTEs that would need to be mitigated. As part of the mitigation efforts, we would recommend that the project sponsor implement transit system management measures, such as car sharing, the promotion of transit use and other alternative methods of travel.

If and when this project proceeds to construction, please contact our Street Operations and Special Events Office at 923-6558 to coordinate construction activities and mitigate any possible delays to bus lines on 19th Avenue or around the campus.

The MTA looks forward to establishing an MOU with SFSU to cover the potential additional operating costs resulting from the expansion. This would include the additional staff, equipment, and work needed in the peak hours. As you know, the existing lines serving the campus are at capacity during certain times of the day, and thus additional service would be required on those lines to meet the increased demand. We look forward to working with the university to prepare the appropriate service, capital and operating plans.

Sincerely,

Peter Strauss
Manager of Service Planning

Cc: L. Kramer, MEA, DCP,
S. Nickerson, TIDF
Response to Comment Letter 2C

Response to Comment 2C-1. Comment noted.

Response to Comment 2C-2. Firstly, the Campus Master Plan does not contemplate 25,000 new students. Rather, the document addresses the increase in the enrollment ceiling target from 20,000 FTE students to 25,000 FTE students, or a 5,000 FTE increase. As noted in the Draft EIR (page 3-8) and in Master Response 10, Campus Population Growth Evaluated in the Draft EIR the environmental analysis contained in the EIR is based on the associated net increase in total students, also known as student headcount.

The Existing Conditions Analysis report for the Campus Master Plan does provide a discussion of mode split, which indicates that transit or campus shuttles are the most common modes of travel to the campus. See revised Draft EIR text in Chapter 3, Changes to the Draft EIR, which summarizes this information.

In terms of transit services, the Draft EIR based its transit analysis on the City and County of San Francisco’s Transportation Impact Analysis Guidelines for Environmental Review, which calls for a PM peak hour analysis for transit. However, since universities typically do not have travel patterns that conform to the traditional peak period, a transit impact analysis for a period other than the typical 5:00-5:59 p.m. peak hour was analyzed as part of the preparation of the Final EIR. (Please see Appendix B, Transit Impact Analysis, for the detailed analysis of transit impacts.)

To determine this campus peak hour, Muni ridership data was analyzed for the stops directly adjacent to SF State to determine the time periods of highest activity, and thus the appropriate alternate peak hour, if one would be applicable. Data for the stop on each line closest to SF State in each time period was analyzed, using data for both boardings and alightings. The totals for each time period were divided by the number of hours in each time period to give an average hourly total for each hour within each time period. The averages are shown in Table 4.3-1. (Note that as with all other Muni analysis, data for the M-Ocean View line was not available.)

**Table 4.3-1: Average Hourly Stop Activity at SF State**

<table>
<thead>
<tr>
<th>Time Period</th>
<th>Average total boardings per hour</th>
<th>Average total alightings per hour</th>
<th>Average total one-hour activity for each hour in time period</th>
</tr>
</thead>
<tbody>
<tr>
<td>4:00-6:59 a.m.</td>
<td>27.9</td>
<td>43.0</td>
<td>70.9</td>
</tr>
<tr>
<td>7:00-8:59 a.m.</td>
<td>183.7</td>
<td>323.1</td>
<td>506.7</td>
</tr>
<tr>
<td>9:00-9:59 a.m.</td>
<td>115.8</td>
<td>212.7</td>
<td>328.5</td>
</tr>
<tr>
<td>10:00 a.m.-1:59 p.m.</td>
<td>175.0</td>
<td>180.7</td>
<td>355.7</td>
</tr>
<tr>
<td>2:00-3:59 p.m.</td>
<td>222.2</td>
<td>151.2</td>
<td>373.4</td>
</tr>
<tr>
<td>4:00-5:59 p.m.</td>
<td>211.9</td>
<td>97.7</td>
<td>309.6</td>
</tr>
<tr>
<td>6:00-6:59 p.m.</td>
<td>111.8</td>
<td>47.9</td>
<td>159.7</td>
</tr>
<tr>
<td>7:00 p.m.-1:59 a.m.</td>
<td>29.7</td>
<td>14.7</td>
<td>44.4</td>
</tr>
</tbody>
</table>

From the data available, the time period with the busiest average hourly activity is the 7:00-8:59 a.m. period, with a one-hour average of almost 507 riders per hour. This is due to the very high amount of...
alighting activity at the SF State stops, in addition to high levels of boardings. This one hour average is approximately 35 percent higher than the next-closest hourly average, which would be the 2:00-3:59 p.m. period. This data suggests that the peak analysis should be performed on a one-hour period within the 7:00-8:59 a.m. period, as the period when the campus appears to have the highest level of activity within a one-hour period.

The peak hour of activity for the campus does not correlate exactly with the peak hour of loads on the Muni system, and this is important to recognize when looking at the data. The peak loads on the Muni system as a whole are still between 5:00 and 5:59 p.m., and this is reflected in the screenline analysis that shows higher loads at the screenlines in the 5:00-5:59 p.m. period than in the 8:00-8:59 a.m. period. However, the SF State component of the ridership and the levels of SFSU activity are higher in the 8:00-8:59 a.m. period. Therefore, the established campus peak hour is from 8:00-8:59 a.m. Please see Appendix B, Transit Impact Analysis, for the detailed analysis of transit impacts. Please also see Master Response 15, Transportation Impacts.

Response to Comment 2C-3. It is important to note that the Existing Conditions Analysis report for the Campus Master Plan and cited on Draft EIR page 4.11-9 concluded the 28-line and M-Ocean View line are “overcrowded when arriving at SF State during the morning peak and leaving during the afternoon peak.” However, the report conclusion is only based on casual observations (not data analysis) made during the survey period from November-December 2005. In contrast, the existing year screenline analysis outlined in the revised detailed transit analysis was constructed from available ridecheck and bus stop file data during the campus peak hour (8:00-8:59 a.m.) and standard peak hour (5:00-5:59 p.m.). Please see Appendix B, Transit Impact Analysis for further information.

Bus stop files and ridecheck data were directly obtained from the Muni Service Planning and Muni Scheduling Offices from November-December 2006. The Muni data used for the screenline analysis averages ridership over all vehicles traveling during each time period, so it is possible that incidental observations could be made of crowded conditions on one vehicle during the time period, when data analysis of the entire time period would not reveal a problem for the entire time period. Transit lines with heavy ridership, such as Muni lines, often experience bunching and gapping in daily operation, which can cause individual vehicles to become overloaded, even when the sum total of all vehicles within a one or two-hour time period, when averaged, may not be reported as overloaded. This may explain the difference between the qualitative conclusions provided in the Existing Conditions Analysis Report and the existing conditions screenline analysis capacity conclusions for the 28-line. As mentioned earlier, given the unavailability of M-Ocean View line ridecheck data, it was not possible to calculate current ridership and project future ridership for the M-Ocean View line in the Muni screenline analysis. Please also refer to Master Response 15, Transportation Impacts for additional information about the transit analyses conducted for this EIR.

Response to Comment 2C-4. As indicated in Master Response 15, Transportation Impacts the original and revised transit analyses conducted for this EIR concluded that significant impacts could occur on the M-line and the campus shuttle due to SF State growth contemplated in the Campus Master Plan.
The campus has committed to address any peak transit overcrowding due solely to its expansion by improving the campus shuttle system in the corridors where transit capacity may be a concern, as described in Mitigations TRA-2B and TRA-2C. Further, the Campus Master Plan provides for a comprehensive transportation management program to maximize the use of alternative modes of travel and to minimize the use of the single-occupant vehicles (see Campus Master Plan pages 83 through 88, and Draft EIR pages 3-22 through 3-28). Please see Master Response 15, Transportation Impacts for a summary of these programs and for further information about the transit analyses performed for this EIR.

Response to Comment 2C-5. Comment noted. SF State will contact MTA’s Street Operations and Special Events Office to coordinate construction activities.

Response to Comment 2C-6. Please see Master Response 15, Transportation Impacts.
MEMORANDUM

TO: Mr. Richard Macias
    Capital Planning Design and Construction
    San Francisco State University

FROM: Jerry Robbins, Transportation Planning Manager

SUBJECT: Comments on SFSU Master Plan EIR

DATE: March 27, 2007

We have reviewed the Traffic, Circulation and Parking section of the report entitled: “SFSU Master Plan Draft EIR” as it appeared on the website: http://03tilt.com/sfsu/eir/chapter_4.11.pdf in March 2007 and have the following comments:

Page 4.11-2: Mode Split: It would be helpful if the report summarized the percentage of SFSU students and SFSU staff that arrive to campus by each mode of transportation, including carpools, motorcycles, bicycles and on foot. How do students and staff differ? What percentage of students live on campus versus commuting to campus? What percentage of SFSU students currently live within one mile of campus? How does this compare to other Bay Area colleges such as UC Berkeley, the University of San Francisco and San Francisco City College?

Page 4.11-9, 2nd paragraph: Based on the Muni ridership data shown on Table 4.11-11, Muni Route 28 does not overcrowded. Please reconcile.

Page 4.11-10, 3rd paragraph: The report should describe use of on-street parking by SFSU affiliates. There are two Residential Permit Parking areas near SFSU: Areas E and H. Several of the streets in Area H have one-hour time limits in an effort to discourage use of these streets by SFSU students. This is alluded to on page 4.11-38, top paragraph, but without any analysis. The report should discuss on-street motorcycle parking availability and usage.

Page 4.11-10, 4th and 5th paragraphs: Please describe any existing Transportation Demand Management programs. Does SFSU provide carpool or vanpool parking incentives for faculty, staff or students? As stated on page 4.11-25, students pay $5 per day for parking and most faculty and staff pay less than $1 per day. Do students subsidize faculty and staff parking costs? How does this low parking cost impact faculty and staff transportation choices to SFSU? What percentage of SFSU parking spaces...
are occupied by faculty and staff? Does SFSU offer parking cash-out programs for faculty and staff? Does SFSU provide any transit incentives to SFSU faculty and staff, such as reduced cost transit passes or preferential parking for carpools and vanpools? Does SFSU participate in the Commuter Check or Wage Works programs to allow tax benefits for transit pass purchases by employees?

Page 4.11-10, last paragraph: What is the existing pedestrian level of service at campus entrances, such as 19th Avenue and Holloway? Page 4.11-36 describes future pedestrian LOS, but does not discuss existing pedestrian LOS.

Page 4.11-11, 4th paragraph: The report states that there are not pedestrian signals at the intersections of Lake Merced Boulevard with Font Boulevard and State Drive. Is SFSU willing to fund pedestrian traffic signal improvements at these locations as part of the Master Plan?

Page 4.11-12, 2nd paragraph: Are the statements in this paragraph based on the small volume of collision data provided at: http://sfuimasterplan.com/analysis_26.html? Did the draft EIR investigate the causes of these collisions? What are the specific safety concerns that are referred to?

Page 4.11-11, 5th paragraph: The report should point out that 29th Avenue between Winston and Eucalyptus Drives (through the Stonestown parking lot) is not a city-owned street.

Page 4.11-17, Table 4.11-5: Please explain why overall traffic delay would decrease at the intersections of Junipero Serra/19th Avenue Junipero Serra/Ocean as a result of the project.

Page 4.11-26: The meaning of the two graphs regarding parking costs and demand is not clear. Is something specific proposed?

Page 4.11-28, 3rd paragraph: The combined width of the right hand lane and the parking lane on southbound Lake Merced Boulevard north of South State Drive is 19. It is not clear if there is sufficient width to convert the parking lane to a traffic lane without widening the street. More detailed analysis of the feasibility of this measure is needed.

Page 4.11-28, 4th paragraph: The combined width of the right hand lane and the parking lane on southbound Lake Merced Boulevard north of Font Boulevard is 19. It is not clear if there is sufficient width to convert the parking lane to a traffic lane without widening the street. This measure would require two eastbound lanes on Font Boulevard east of Lake Merced Boulevard to accommodate the dual left turn lane on southbound Lake Merced Boulevard. It is not clear if this can be done without widening Font Boulevard.
Richard Macias  
March 27, 2007  
Page 3 of 3

Page 4.11-53, first paragraph: Change "increased headways" to "increased frequencies."

Page 4.11-19, 2nd paragraph: Parking in Residential Permit Parking areas "E" and "H" near SFSU is already limited to one hour on several streets.

JR/PlanningDept/2007/SFSU/draftEIR
Response to Comment Letter 2D

Response to Comment 2D-1. For the total journey to campus, transit is the most popular mode of transportation with 58 percent of those surveyed indicating they used transit or the SF State shuttle for some portion of their commute. Walking was reported by 27 percent of survey respondents, making it the second most common transport mode. About 50 percent of SF State affiliates relied on an automobile at some point in their journey to campus (about half of these drove alone and half utilized high occupancy vehicles). Commuting by bicycle is fairly uncommon, with only 3 percent of respondents indicating that they traveled by bicycle. If only the last leg of the journey arriving to the SF State campus is assessed the transit/shuttle mode continues to be the most common at 43 percent of those surveyed. Text has been revised to reflect the above. Please see Chapter 3, Changes to the Draft EIR.

The results of the cordon surveys conducted as part of the Campus Master Plan Existing Conditions Analysis did not allow for a distinction to be made between the behavior of students and the behavior of faculty and staff. About 12 percent of existing campus students live on campus. It is unknown how many students may live within one-mile or otherwise in close proximity to the campus, as that information was not obtained during the surveys, nor is it discernable from zip-code information. For further details about the existing conditions surveys conducted as part of the Campus Master Plan, please see Existing Conditions Analysis prepared in conjunction with the Campus Master Plan (WRT, 2006).

Response to Comment 2D-2. Please see Response to Comment 2C-3.

Response to Comment 2D-3. Draft EIR page 4.11-10 (fifth paragraph) does generally describe the use of on-street parking by SF State affiliates, based on the intercept surveys and does refer to time-restricted parking surrounding the campus due to the City’s residential permit program. The Campus Master Plan Existing Conditions Analysis further documents the extent to which campus commuters park on City streets surrounding the campus, including both total numbers and locations (WRT, 2006). Text has been revised to clarify the nature of the City’s program. Please see Chapter 3, Changes to the Draft EIR.

SF State provides adequate motorcycle parking on campus. There is also metered on-street parking on Tapia and Holloway Avenues, some of which is reserved for motorcycle parking (WRT, 2006). Please also refer to Master Response 15, Transportation Impacts.

Response to Comment 2D-4. The Draft EIR (page 4.11-12) provides a summary of existing Transportation Demand Management (TDM) programs that are in operation on the SF State campus. The Campus Master Plan Existing Conditions Analysis provides additional information about these programs (WRT, 2006).

Overall, the current alternative transportation programs (also called Transportation Demand Management or TDM programs) available to all SF State affiliates include the SFSU shuttle to Daly City BART, the attended Bike Barn facility, and information on alternative modes of transport provided by the SF State transportation Web site. Other TDM programs include promotion of Ride Matching by marketing to those who live in the same area to increase participants. This program includes provision of dedicated carpool parking in choice locations around campus or the parking garage and automatic enrollment of participants in a Guarantee Ride Home program. Faculty and staff may also purchase transit passes with
pre-tax dollars through the Commuter Check program. Finally, parking charges are levied to cover the operations costs of providing parking. Please also see Response to Comment 2A-5.

Please refer to Master Response 15, *Transportation Impacts*, for a summary of planned improvements to SF State TDM programs and for discussion of additional transportation-related mitigation measures identified in the Draft EIR.

**Response to Comment 2D-5.** Based on the methodology and assumptions documented on Draft EIR page 4.11-36, it is projected that approximately 1,400 campus affiliates use pedestrian facilities along Holloway Avenue and 19th Avenue under existing conditions during the peak hour and about 350 campus affiliates use the pedestrian facilities in a 15-minute period within the peak hour. Based on the Highway Capacity Manual 2000 LOS threshold of D, the pedestrian facilities at the intersection of Holloway Avenue and 19th Avenue operate at acceptable levels of service under existing conditions.

**Response to Comment 2D-6.** As indicated in Master Response 15, *Transportation Impacts*, based on a field investigation conducted during the preparation of this Final EIR, pedestrian signals do, in fact, exist and are in good repair at the intersections of Lake Merced Boulevard/Font Boulevard and Lake Merced Boulevard/South State Drive. Further, there are no other deficiencies related to the pedestrian crossings at these two intersections. The text of the Draft EIR has been revised to reflect these conditions. Please refer to Chapter 3, *Changes to the Draft EIR*, for revised text.

**Response to Comment 2D-7.** The number of pedestrian collisions at most locations in the vicinity of the campus is considered to be fairly typical and is not an indication of hazardous conditions. As shown in Figure 6 of the Campus Master Plan Existing Conditions Analysis (WRT, 2006), most locations shown on the figure had one or fewer collisions during 2004-2005. The exception is along 19th Avenue, which is the subject of the San Francisco County Transportation Authority’s 19th Avenue Transportation Plan, which proposes a variety of pedestrian safety improvements at 19th and Holloway that are funded in its Phase 1 recommendations. See Draft EIR page 4.11-36 for additional information about SFCTA’s 19th Avenue Transportation Plan. Please also see Master Response 15, *Transportation Impacts*, for additional information.

**Response to Comment 2D-8.** Text has been revised in response to this comment. Please refer to Chapter 3, *Changes to the Draft EIR*, for revised text.

**Response to Comment 2D-9.** The reported LOS and average delay at the intersection of Junipero Serra Boulevard/Ocean Boulevard was a typo in Table 4.11-6 of the Draft EIR. The table has been revised. Please refer to Chapter 3, *Changes to the Draft EIR*.

**Response to Comment 2D-10.** These charts simply illustrate the two main concepts behind the proposed parking construction replacement strategy outlined in the Campus Master Plan. The first chart illustrates the relationship between the costs of new parking garage construction as they are planned in the Campus Master Plan over time and the corresponding rise in user fees/parking prices. The intent is to illustrate
that the rising price of parking from construction of too much parking can cause spillover problems just as severe as building too little. The second chart illustrates the change in demand that will result from construction of maximum parking supply to prevent spillover versus a fixed ratio based on current utilization rates. It then charts the effect of a fee on each of these demand curves. Again, this illustrates that supply will outpace demand if too much parking is constructed. Please also refer to Master Response 15, Transportation Impacts.

Response to Comment 2D-11. The combined width of the through and parking lane on southbound Lake Merced Boulevard, north of South State Drive is 19 feet, according to the comment. The improvement of the intersection of Lake Merced Boulevard and South State Drive identified on Draft EIR page 4.11-28 would provide an additional exclusive southbound left-turn lane and removal of on-street parking along Lake Merced Boulevard within about 600 feet south of the intersection with South State Drive. The required minimum width for a left-turn lane is 11 feet. Provided that the combined width of the through and parking lane is 19 feet, the recommended improvement along Lake Merced Boulevard would be feasible.

Response to Comment 2D-12. Please refer to Response to Comment 2D-11. Under existing conditions a wide median exists on Font Boulevard between the eastbound and westbound direction. It would be feasible to implement the recommended improvement of the intersection of Lake Merced Boulevard and Font Boulevard by reducing the width of the center median along Font Boulevard or by the removal of on street parking along Font Boulevard within 500 feet of the intersection with Lake Merced Boulevard.

Response to Comment 2D-13. Text has been revised in response to this comment. Please see Chapter 3, Changes to the Draft EIR, for the text revisions.

Response to Comment 2D-14. Page 4.11-39, 2nd paragraph has been corrected to note that parking on residential streets near SF State is already limited to one hour on several streets. See Chapter 3, Changes to the Draft EIR, for the text revisions.
April 2, 2007

Mr. Richard Macias
Capital Planning, Design and Construction
San Francisco State University
1890 Holloway Avenue
San Francisco, CA 94132

Re: San Francisco State University Campus Master Plan
Draft Environmental Impact Report
(SCH # 2006102050)

Dear Mr. Macias,

The Planning Department Major Environmental Analysis unit appreciates the ability to comment on the DEIR for the Campus Master Plan. The following are topical comments provided by our Department staff. We look forward to seeing the EIR address these issues:

Introduction, Chapter 1

1.1 Purpose
Can an explanation be provided for reader as to why CSU is acting as Lead Agency? Can more elaboration be provided on limitations to exclusion from local regulation?

Much data are presented without attribution. Can the data be cited and available as appendices or as readily available technical reports that are part of the public file?

1.3 Program EIR
Whether a project or program EIR, addition of a net 1.2 million square feet of non-residential building space, connecting to Lake Merced, requires supporting EIR-generated studies of impacts on transportation, economics, historic and cultural resources, biological resources, or utility infrastructure, and cumulative impacts.

Many of the Plan projects are of sufficient specificity as to warrant project-level analysis in this review. Does review of impacts and proposed mitigation at the time of preparation for development substitute for substantive analysis of projects described in the Master Plan, particularly “firm” projects or those nearer on the development horizon? Isn’t CSU deferring firm impact and mitigation until some future date? A program-only EIR is inappropriate.

1.7 Levels of Significance; 5.2 Overview
Since SFU chooses to defer project-level review to subsequent points in time, many of the impact areas which are concluded to be “Less-Than-Significant” are potentially significant since they are evaluated absent project-level information and dependent on future, and in some cases non-existent guidelines/procedures (AES-3), mitigation.
Future review would be necessary, regardless, since the EIR lacks the specificity to fully and adequately mitigate these impacts. This is true of nearly all impact areas.

Biological Resources, Section 4.3
4.3.2.2 Analytical Methods
Can more information be provided for Section as it states: "A qualified biologist conducted a survey," since this survey is not referenced or referred to elsewhere in the EIR? Be advised that lack of sufficient background surveys and documents has resulted in courts finding EIRs insufficient and have delayed projects and rescinded approvals as recently as last June for State permitted projects.

4.3.2.3 Mitigation BIO-1A
The San Francisco Recreation and Parks Department, which manages Lake Merced, needs to be integral to development of bridges, access, or other improvements, as well as PUC for drainage and water quality issues as these are within their jurisdiction and not the State's or CSU's.

Cultural Resources, Section 4.4
Archeological Resources
4.4.1.2 Prehistoric Context
Nothing is said about prehistoric sites in San Francisco or in this part of San Francisco. There should be some discussion of what types of prehistoric sites occur in San Francisco, where they have been found, and what identifying associations known sites possess. Certain types of prehistoric sites would be anomalous if found in the Project Area while other types of prehistoric sites might be more expected. This section does not provide sufficient background information to support determinations later in the document as to what sort of prehistoric resources (if any) could be expected to occur and why and could these resources be important vis-à-vis what we know of the prehistory of the area.

4.4.1.3 Historical Context
This section says nothing about what has occurred within the Project Area prior to the construction of the first campus buildings here. The area did have dairy farms, resort-lands, and other improvements dating from the 1850s. There are a variety of documentary sources of information including historic maps including the 1860s GLO Survey Plats, photos, local histories, internet sites, City resources, and U.S. Census population and agricultural schedules that can provide a minimum documentary record. This is needed to assess the potential for historical archeological deposits/features to be present that could be affected by planned improvements under the Master Plan. Without a technical report that covers these resources, there is no evidence for making impact determinations.

4.4.2.4 Campus Master Plan Impacts and Mitigation Measures
The structure of the archeological mitigation measure section of the DEIR is confusing. Mitigation CULT-1A seems to be both a testing mitigation that applies to the site of CA-SFR-25 and an accidental discovery mitigation measure that applies to any other soils disturbing activity. The purpose of Mitigation CULT-1B seems be to provide specifics as to protocol and required documentation in the event that an archeological consultant must be retained either through the testing or accidental discovery provisions of Mitigation CULT-1A.

The City suggests that there be two separate archeological mitigation measures with one related to CA-SFR-25 and the other related to all other potential soils disturbing activities. We have modified our Standard Archeological Testing Mitigation Measure as a possible model for the mitigation related to CA-SFR-25:
ARCHEOLOGICAL MITIGATION MEASURE - Testing

If the project site is within 200 feet of archaeological site P-38-00025/CA-SFR-25, the campus shall conduct archaeological subsurface testing in accord with the following requirements.

Based on a reasonable presumption that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology, in the opinion of the Planning Department archeologist, shall be retained. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure.

Archeological Testing Program. The archeological consultant shall prepare an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA. At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings.

Archeological Monitoring Program. If it is determined that an archeological monitoring program shall be implemented, the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site until such time that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifact/soil material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease immediately. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated.

The archeological consultant shall submit a written report of the findings of the monitoring program to the City's Environmental Review Officer (ERO).

Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be
adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:
- **Field Methods and Procedures.** Descriptions of proposed field strategies, procedures, and operations.
- **Cataloguing and Laboratory Analysis.** Description of selected cataloguing system and artifact analysis procedures.
- **Discard and De-accession Policy.** Description of and rationale for field and post-field discard and de-accession policies.
- **Interpretive Program.** Consideration of an on-site/off-site public interpretive program during the course of the archaeological data recovery program.
- **Security Measures.** Recommended security measures to protect the archaeological resource from vandalism, looting, and non-intentionally damaging activities.
- **Final Report.** Description of proposed report format and distribution of results.
- **Curation.** Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

**Human Remains and Associated or Unassociated Funerary Objects.** The treatment of human remains and of associated or unassociated funerary objects discovered during any site disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner’s determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5087.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines, Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.

**Final Archeological Resources Report.** The archeological consultant shall prepare a Final Archeological Resources Report (FARR) that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

In addition to the copies of the FARR requested by San Francisco State University, one copy each of the FARR shall be distributed to the California Archaeological Site Survey Northwest Information Center (NWIC) and to the Environmental Review Officer of the Planning Department of the City and County of San Francisco.

**Historic Resource Impacts**

Upon review of the published Draft EIR for the proposed Campus Master Plan, there are several concerns regarding known areas of controversy, known cultural resources, impact of the proposed Campus Master Plan, and mitigations measures. The issues on the next page should be addressed prior to publication of the final EIR.
2.6 Known Areas of Controversy (Page 2-5)
The narrative summary of the known areas of controversy, on Page 2-5 of the draft EIR does not include mention of the potential historic resource now known as the Villas Parkmerced. The Villas Parkmerced were added to the Landmarks Preservation Advisory Board (LPAB) Work Program for 2007, based on information presented at the November 1, 2006 LPAB public hearing. The Villas Parkmerced may be a potential historic resource for the purposes of CEQA, and the proposed Campus Master Plan may have a significant negative impact to a potential historic resource.

The narrative summary on Page 2-5 should include mention of the known controversy regarding the potential significant impact to what may be a potential historic resource.

4.4.1.5 Known Cultural Resource Sites and Prior Surveys
On Page 4.4-5, the draft EIR notes that Mary Ward Hall, a concrete building constructed on the campus in 1960 was given a National Register Status Code of 8Y2, "which means that it was not determined to be eligible for inclusion on the National Register of Historic Places (NRHP) at the time it was evaluated." Although this is a small change, it may clarify the determination if the phrase were re-worded to say, "which means it was determined not to be eligible for inclusion on the National Register of Historic Places (NRHP) at the time it was evaluated."

4.4.2.4 Campus Master Plan Impacts and Mitigation Measures
The Draft EIR notes on page 4.4-13 that the implementation of the Campus Master Plan "could cause a substantial adverse change in the significance of a historical building...as a result of alteration, removal or demolition of the building, or alteration of the site associated with project development." This potential impact is considered as "potentially significant" in the Draft EIR. Mitigations listed include developing and considering preservation alternatives that would not result in significant impacts. The Planning Department concurs with this assessment.

However, the report presents Mitigation CULT-2C (Page 4.4-14-15) where avoidance of demolition or major alterations to historic structures is not feasible. Mitigation CULT-2C (ii) is documentation, including, "still and video photography, and a written documentary record of the building to the standards of the Historic American Building Survey (HABS) or Historic American Engineering Record (HAER)..." Although the Planning Department encourages the accurate and complete documentation of historic structures, it should be clearly noted in the Draft EIR that documentation cannot be considered a mitigation measure that brings the impact of a proposed project from "significant" to "less than significant."

The Planning Department concurs with the finding, on Page 4.4-16 of the Draft EIR, that the implementation of the proposed Campus Master Plan could result in a significant and unavoidable impact on historic resources.

Land Use and Planning, Section 4.8
How do retail and "semi-public uses," such as the proposed 1) Conference Center/Hotel and 2) Gymnasium/Recreation-Wellness center/gym described (3.7.3.3), conform to the educational mission that exempts their development from municipal jurisdiction?

4.8.1.4 State and Local Land Use Plans and Policies
How does SFSU plan to work with local jurisdictions on further development and implementation of their Master Plan?
San Francisco Planning Code Section 304.5 requires post-secondary educational institutions to submit an updated Institutional Master Plan (IMP) that outlines current conditions and proposed development. SFSU last submitted an IMP in 1988, and should coordinate with the Planning Department on submitting an updated IMP.

Population and Housing, Section 4.10

Existing Housing Demand
The current number of beds and units provided at SFSU (Table 4.10-3) allows an estimate that SFSU provides housing for 2,700 to 3,000 of its students. That translates to 10 - 12% of the enrolled students. Given that SFSU is no longer solely a commuter school, the high prices of housing in the Bay Area, and the preference for young college students to participate in a college community, it is likely that there is already a very high demand for more on-campus housing. In discussing the potential effects of the proposed project, the EIR must acknowledge that there is an existing unmet on-campus housing demand, and that the project, as proposed, is likely to exacerbate this condition.

Project Housing Demand
The EIR seems to underestimate the number of new students and thus the demand for new housing. Currently there are 26,596 students equating to 20,000 FTE (Table 3.1). That is a ratio of 1.33 students per FTE. Thus, if SFSU expect to grow by 5,000 FTE we’d expect 6,650 new students. However, on page 4.10-9, the EIR states that at 25,000 FTE there would be 32,113 students, which represents an increase of only 5,517 students (32,113 - 26,596). Thus, the EIR underestimates the number of new students by approximately 1,113 (6,650 - 5,517).

On page 4.10-9, the EIR estimates that 50% of new students come from outside the Bay Area, and thus 50% of enrolling students will need new housing. On this point, we have two comments.
- First, given the lack of supporting data, the 50% seems a somewhat arbitrary number. However, this figure is integral in determining new housing demand. Thus, SFSU must offer more analysis and documentation of what percentage of students will be enrolling from outside the Bay Area by 2020.
- Second, the analysis assumes that none of students enrolling from inside the Bay Area will need new housing. The Bay Area is a very large geographic region. While SFSU is well served by transit and highways, it still seems likely that a percentage of enrolling students from within the Bay Area will need housing. Again, SFSU must offer more analysis on what percentage that could be.

4.10.2.2 Analytical Method
The EIR assumes that students first choose whether or not they want to live in San Francisco, and then if they choose to live in San Francisco they will choose whether or not to live on campus. Thus, on page 4.10-11, it is assumed that of the 2,760 students new to the Bay Area, 1,545 (56%) will choose to live in San Francisco. Of those, 1,270 can be accommodated in new campus housing. Therefore, there will be 275 students seeking off-campus in San Francisco, compared to 1,215 students looking elsewhere. In other words, only 18.5% of students not housed on campus will seek housing in San Francisco.

We feel this analysis reverses the actual sequence of seeking housing. For students, the first order of decision is whether or not they can/will be housed on campus. Then, those seeking off-campus will determine where they will live within the Bay Area. Given this order of sequence, we can say
that 51% students who live off-campus are located in San Francisco. Assuming this trend continues, 51% of the 1,490 students new to the Bay Area will seek housing in San Francisco, yielding a demand of 754. Wouldn't this demand be higher, given the comments above?

Please employ the above methodology for assessment of housing demand created by new faculty and staff also.

**Reduced housing supply**

In Table 4.10-8, the EIR discussion that the proposed project would increase off-campus demand by 135 housing units. However, this fails to account for the units in UPN and UPS that would be utilized by SFSU and would no longer be available to the general public. Based on the discussion on page 4.10-4, by 2020 this would result in an additional demand of 525 units in San Francisco. This is not divulged in the DEIR.

Impact POP-5 shows that, through 2020, the demand for new housing in both San Francisco and the Bay Area as a whole is expected to substantially outstrip supply. For San Francisco, the project is expected to exacerbate this deficit by 2.5%. The EIR concludes, however, that because the project would not constitute a substantial portion of the total housing demand, it would not be part of a cumulatively significant impact. Towards this end, we have two comments:

- It is not clear from this analysis what would be considered a "substantial portion". It is likely that, given San Francisco's current housing market, the addition of 1,545 new students would exacerbate demand and should be considered cumulatively significant.
- Additionally, as stated above, we believe that the EIR substantially underestimates the demand for housing in San Francisco. Using the proposed methodologies above, it is very likely that demand from new housing demand from new students and faculty will exceed 500 units, (assuming three students per unit) and more if occupancy is lower than three students per unit. Considering the 525 units taken off the market at UPN and UPS, this demand exceeds 1,000 units. Under such circumstances, the project is expected to exacerbate the forecasted housing deficit by over 15%, which is cumulatively considerable and thus significant.

In conclusion, the Planning Department believes that the proposed project would have significant impacts on housing in San Francisco by exacerbating existing and forecast affordable housing shortages. As mitigation, SFSU should consider increasing the number of housing units provided on campus as part of this Master Plan process, perhaps in lieu of the Hotel/Conference Center portion of the project.

**Traffic, Circulation, and Parking, Section 4.11**

**4.11.2.3 Analytical Method**

Since persons, rather than Full Time Equivalents (FTE)s, generate trips, wouldn’t trip generation need to be based on the number of trips per person, and not per FTE? Two part-time students generate multiple trips to campus, even if they are one FTE. Using FTE understates trip generation and transportation impacts from the Campus Master Plan. The analysts should use

---

1 This estimate is based on the following assumptions. First, we estimate the number of students housed on campus as 2,252 in existing beds (assuming 100% occupancy) and 652 living in UPN and UPS (assuming that 75% of the 290 units in Table 4.10-3 are for students, and that there are three students per unit). That yields a total of 2,904 students living on campus. By subtraction, we have 23,892 living off campus. Per page 4.10-5, if there are 11,700 students living in other Bay Area communities, then there are 11,992 students living off-campus in San Francisco. This if 51% of all the students living off-campus.
square footage of use, with mode splits based on a statistically significant number of surveys of travel onto and within the campus, to generate trips and not FTE.

Background Study
Although a transit study was prepared, no background transportation study was prepared for this EIR, analyzing some 1.2 million net new square feet of non-residential space. The numerous assumptions that go into transportation traffic analysis (factors, turning percentages, green times, etc.) are not documented. These assumptions must be documented and justified in the DEIR. Figures 4.11-3 – 8 provide inadequate information to provide the basis for the EIR and its conclusions.

Street Improvements 3.8.1.6, 3.8.1.7, 3.9.1
The traffic and circulation impacts of the proposed street improvements, including designating Holloway and Buckingham as "village main streets," are not analyzed in the EIR. These would impact traffic and circulation. Both Holloway and Buckingham are City streets and San Francisco must be consulted and amenable to changes CSU is planning.

19th Avenue is "envisioned...as a gracious boulevard" with extensive landscaping improvements only the frontage portion of which SFSU would implement. is Caltrans, under whose jurisdiction this State and U.S. highway right-of-way is controlled, involved with these plans or their implementation? As the responsible agency, Caltrans must concur with modifications.

4.11.1.10 Pedestrian and Bicycle Safety
Existing conditions are unacceptably dangerous. What about improvements to pedestrian crossing, (including 19th), and other improvements, given increased dependence on transit and the greater population envisioned in the Campus Master Plan? The DEIR is woefully short of both impact analysis and mitigations.

4.11.2.4 Campus Master Plan Impacts
Absent information about the assumptions used in the EIR transportation analysis, our jurisdiction would assume there are significant "residual" impacts to intersection LOS and transit, which must be mitigated.

4.11.2 Impacts and Mitigation Measures
A number of measures should be considered to give the Transportation Demand Management (TDM) program more substance:

- A designated full-time coordinator to reduce auto use
- Annual program reporting to monitor that no net increase is allowed
- Trips over the cordon count baseline, measured by the City at CSU expense, will result in an immediate pre-determined assessment to SFSU of what success TDM has in getting the drivers off the road and onto alternative modes.
- Increase the frequency of affected MUNI service to reduce overcrowding during actual campus peak service hours, paid for by SFSU.
- A residential parking placard program within ½ mile of campus, paid for by SFSU.
- Short term meters and increased parking enforcement, paid for by SFSU.
- Percentage of pedestrian safety improvements, paid for by SFSU.
- A capital fee for all improvements needed to fund system stops, improvements, lighting, etc.

Mitigation, Impact TRA-1
SFSU qualifies its agreement to make a "fair share" contribution to ameliorate project contributions to intersection traffic by stating it is only applicable if the jurisdiction "has established a mechanism for collecting funds from any other developers and entities contributing to the identified impacts,"
i.e., it only applies if the City has a traffic fee ordinance in place. CEQA's requirement to mitigate project impacts is not subordinate to other State interests, nor dependent on such an ordinance.

Alternatives, Chapters 5 & 6

Increased Housing On Campus

The EIR fails to consider a reasonable alternative to densify development within the existing campus boundaries, especially along 19th Avenue, to meet additional student, faculty, and employee housing needs. This alternative would reduce transportation impacts greatly, avoid consumption of affordable rental housing at UPN and at UPS, and also avoid historic resource impacts.
Response to Comment Letter 2E

**Response to Comment 2E-1.** Please see Master Response 8, *Local Control Over Campus Land Uses.*

**Response to Comment 2E-2.** Separate, stand-alone technical reports for each technical resource area were not prepared for the Draft EIR. Rather, the Draft EIR contains adequate program-level analysis of all topical areas required by CEQA. Qualified planners, scientists and engineers, as well as subconsultants prepared the environmental analyses contained in the Draft EIR. The authors of the various technical analyses are identified in Draft EIR Chapter 7, *List of Preparers and Contributors.* Other data sources relied on are appropriately cited throughout the Draft EIR. This approach was used to avoid the unnecessary duplication associated with preparing stand alone technical reports and studies as the basis for each topic addressed in Draft EIR. However, the Final EIR includes two appendices that contain technical background information used to support the analysis of traffic and transit impacts (see Appendices A and B).

**Response to Comment 2E-3.** The EIR provides analysis of project-specific and cumulative impacts of the full range of topics required under the CEQA Guidelines. CEQA does not require the analysis of social and economic effects, in and of themselves. Rather, CEQA focuses on potentially significant physical environmental changes, as per Section 15131 of the CEQA Guidelines. Please also see Response to Comment 2E-2.

**Response to Comment 2E-4.** Please see Master Response 9, *Program vs. Project-Level EIR Analysis.*

**Response to Comment 2E-5.** Please see Response to Comment 2E-2. URS biologists Corina Lu and Jan Novak conducted the reconnaissance-level survey of the campus in August 2006. Please also see Master Response 12, *Biological Resource Impacts* and Response to Comment 4-26.

**Response to Comment 2E-6.** Text has been revised in response to this comment. See Chapter 3, *Revisions to the Draft EIR.*

**Response to Comments 2E-7 and 2E-8.** These comments indicate that the section does not provide sufficient background information to support determinations related to the type of resources that could potentially occur and the importance of such resources. The Draft EIR does not attempt to define or otherwise limit the type of resources that could potentially occur, nor does it attempt to evaluate the importance of these resources. Rather, the Draft EIR Section 4.4, *Cultural Resources* provides an appropriate programmatic approach for addressing the full range of potential cultural and historic resource impacts that could result on campus with development contemplated by the Campus Master Plan. As indicated in the Draft EIR, the analysis assumes that any ground-disturbing activities in any area of campus where development will occur could potentially affect cultural resources.
Response to Comment 2E-9. Mitigation CULT-1A provides the campus with protocol for proceeding with the planning, environmental review, and construction of all future projects contemplated in the Campus Master Plan. This measure provides for subsurface testing for sites within 200 feet of CA-SFR-25, but also acknowledges that resources could be inadvertently discovered during construction. Regardless of whether an archaeological site is discovered through testing near CA-SFR-25 or via inadvertent discovery, Mitigation CULT –1B (Draft EIR page 4.4-12) would need to be implemented in the event that subsurface cultural resources are encountered, to accomplish the following:

- Determine whether the resource qualifies as a historical resource or a unique archaeological resource.
- Prepare a research design and archaeological data recovery plan for significant resources.
- Implement the data recovery plan prior to or during development of the site.
- Perform appropriate technical analyses and prepare a full written report and file it with the appropriate information center.
- Provide for the permanent curation of recovered materials.

Additionally, Mitigations CULT-3A through –3C would be implemented if the find involved human remains (Draft EIR page 4.4-16 through –17).

The campus appreciates the effort involved in modifying the City and County of San Francisco’s Standard Archeological Testing Mitigation Measure as a possible model for mitigation related to CA-SFR-25. The mitigation program provided in the Draft EIR and summarized above provides for a comparable approach to mitigating impacts associated with this known site. However, the text of Mitigation CULT-1A has been revised to require written findings of testing conducted under this measure. Please see Chapter 3, Changes to the Draft EIR, for text revisions to this measure.

Further, as noted above, archaeological sites found via inadvertent discovery during construction would need to be evaluated, recovered, curated, etc., in the same fashion as those found during testing near CA-SFR-25. The mitigation program provided by the City appears to apply only to sites found within 200 feet of CA-SFR-25.

Response to Comment 2E-10. Text has been revised in response to this comment. Please see Chapter 3, Changes to the Draft EIR. Please also see Master Response 13, Parkmerced Historical Resource Impacts.

Response to Comment 2E-11. Text has been revised in response to this comment. Please see Chapter 3, Changes to the Draft EIR.

Response to Comment 2E-12. Please see Master Response 13, Parkmerced Historical Resource Impacts.

Response to Comment 2E-13. Please see Master Response 8, Local Control Over Campus Land Uses.
Response to Comment 2E-14. Please see Master Response 8, Local Control Over Campus Land Uses.

Response to Comment 2E-15. It is acknowledged that there is an existing unmet on-campus housing demand, which varies from year to year. However, such an unmet demand or exacerbation of such a demand is not an environmental impact in and of itself. The two CEQA standards of significance related to housing that are evaluated in the Draft EIR address the potential displacement of substantial numbers of existing housing or existing people, necessitating the construction of replacement housing elsewhere. These standards are evaluated in Impact POP-3 and Impact POP-4. An additional standard is also evaluated in the Draft EIR that acknowledges environmental effects related to the creation of a demand for housing that would exceed the supply or contribute substantially to a cumulative demand for housing that could not be accommodated by local jurisdictions. The environmental effects contemplated by this standard relate to: (1) the need to build additional housing above and beyond that already identified and evaluated in long-range or general plans by the local jurisdiction, or (2) the need to build housing at some distance from the source of the new demand in areas where additional housing, above and beyond that already planned for, could not be accommodated.

The potential exacerbation of unmet demand for on-campus housing is evaluated in the Draft EIR in terms of the potential for the project to result in demand for housing that would exceed the planned supply or could not otherwise be accommodated by local jurisdictions. Please see Draft EIR Impact POP-3 and POP-5, pages 4.10-14 and 4.10-16, respectively. Please also see Master Response 14, Regional Housing Supply Impacts.

Response to Comment 2E-16. Please see Master Response 10, Campus Population Growth Evaluated in the Draft EIR.

Response to Comments 2E-17 and 2E-18. Please see Master Response 14, Regional Housing Supply Impacts.

Response to Comment 2E-19. Please see Master Response 14, Regional Housing Supply Impacts. This comment indicates that the addition of 1,545 new students in San Francisco identified in the Draft EIR would exacerbate demand and should be considered as cumulatively significant. However, the 1,545 student number cited from the original Draft EIR text is for all new students that would be seeking housing in San Francisco, including those that would be housed on campus. Please also see Chapter 3, Changes to the Draft EIR, for revisions to the housing analysis that have resulted from the project refinements contemplated in the final Campus Master Plan.

Response to Comment 2E-20. Please see Master Response 14, Regional Housing Supply Impacts, Master Response 3, Need for More On-Campus Housing, and Master Response 2, Need for Conference Center.

In general, trip generation provided in the Draft EIR was not based on square footage of the various land uses contemplated in the Campus Master Plan, as there is too much overlap between the various uses. Rather, trip generation was calculated on a per capita basis. The ITE rates for university students, faculty, and staff take into consideration some amount of on-campus housing and the presence of spouses and families. The only exception to this approach is that trip generation for the conference center/hotel was developed based on the number of hotel rooms. See Response to Comment 1-2 for additional information about trip generation for the conference center/hotel, as originally estimated in the Draft EIR.

Response to Comment 2E-22. Level of service analysis at the study intersections was conducted based on the peak hour factor and turning percentages derived from peak hour turning movement volumes collected in the field at the study intersections and existing signal timing data collected from the City and County of San Francisco and Caltrans. Please see the detailed level of service calculations attached in Appendix A, *Traffic Technical Appendix*.

Response to Comment 2E-23. Please refer to Master Response 4, *Village Main Streets*, which describes the environmental effects of these streets. The Campus Master Plan designates Holloway Avenue and Buckingham as “Village Main Streets,” with residential and limited neighborhood retail along these roads. The Campus Master Plan does not call for substantial changes to the streets themselves with respect to circulation or lane geometries. The number of travel lanes on Holloway Avenue and Buckingham remains the same, however on Holloway Avenue the center median will be eliminated and the street will be reconfigured to provide narrower travel lanes, bike lanes, and to retain parking lanes and widen sidewalks. On Buckingham the width of the travel lanes will be reduced to provide bike lanes, create parking lanes on both sides and widen the sidewalks. The University recognizes that the City and County of San Francisco has jurisdiction over the Holloway and Buckingham rights-of-way and will work with the City and related City agencies to advance plans for these two streets in the short and long term.

Response to Comment 2E-24. This comment concerns the involvement of Caltrans in plans for 19th Avenue described in the Campus Master Plan. The recommendations for 19th Avenue described in the Campus Master Plan represent a long-term vision for traffic, transit, bicycle, and pedestrian improvements that the University considers beneficial not only to the campus but to the district and city overall. The University recognizes that Caltrans has jurisdiction for the 19th Avenue right-of-way and will work with Caltrans and related City agencies to advance plans for 19th Avenue both in the short and long term.


Response to Comment 2E-27. The text in the Draft EIR (page 4.11-29) does not indicate that a traffic fee ordinance has to be in place for the University to pay its fair share. Rather it says that the University
will pay its fair share if the applicable jurisdiction has established and implemented a mechanism for collecting funds from any other developers and entities contributing to the identified impacts, and providing that the jurisdiction actually builds the identified improvements. Based on the results of the 2020 level of service analysis conducted in the Draft EIR, it is clear that the campus’s contribution to traffic in 2020 is relatively small and that other future growth in the vicinity of the campus would contribute the majority of vehicle trips in 2020 (see Chapter 3, Changes to the Draft EIR, revised Table 4.11-10). Under CEQA, mitigation measures must be “roughly proportional” to the impacts of the project and therefore Mitigation TRA-1 contemplates only a fair-share contribution to the identified improvements. Please also see Master Response 15, Transportation Impacts, for additional information.

**Response to Comment 2E-28.** Please refer to Master Response 3, Need for More On-Campus Housing. Please also refer to Master Response 13, Parkmerced Historical Resource Impacts and Master Response 14, Regional Housing Supply Impacts.
Mr. Richard Macias  
Capital Planning, Design and Construction  
San Francisco State University  
1600 Holloway Avenue  
San Francisco, CA 94132

Re: Comments on SF State Campus Master Plan Draft EIR

Dear Mr. Macias,

This letter provides comments on the February 2007 Draft Environmental Impact Report ("Draft EIR") circulated by the California State University Board of Trustees ("CSU" or the "Trustees") for the San Francisco State University ("SF State") Campus Master Plan. The Campus Master Plan proposes increases in student and staff populations at SF State's main campus that will significantly impact the surrounding communities and place additional demands on City and County of San Francisco ("City") services and infrastructure. The following discussion outlines SF State's environmental impact mitigation responsibilities under CEQA and the California Supreme Court decision in City of Marina v. Board of Trustees of the California State University, 39 Cal. 4th 341 (2006) ("City of Marina"). Other City departments will also be separately submitting additional comments on the Draft EIR.

The Draft EIR fails to meet the mitigation requirements set forth in City of Marina. As discussed in more detail below, the Court held: (1) CEQA requires CSU to mitigate off-campus impacts; (2) voluntary payments to local governments are feasible mitigation measures; and (3) mere commitment to make payments to mitigate off-campus impacts, in the absence of good faith efforts to negotiate an agreement with the City, is inadequate.

Under CEQA, the SF State EIR must provide adequate assurance that mitigation of significant off-campus effects will actually occur. CEQA and City of Marina require CSU to actively engage in good faith negotiation with the City regarding off-campus environmental mitigation prior to certification of the EIR. CSU should enter into a memorandum of understanding ("MOU") or other formal agreement with the City. A similar, court-supervised process is underway at CSU Monterey Bay pursuant to the City of Marina decision. The Mayor's Office of Economic and Workforce Development is available to help coordinate negotiations with the City (contact Jesse Blout, Deputy Chief of Staff, at 415-554-6477).

Off-Campus Impacts and City of Marina v. CSU Board of Trustees

In City of Marina, the California Supreme Court squarely addressed the Trustees' responsibility under CEQA to mitigate the off-campus environmental impacts of campus expansion. In rejecting the Trustees' arguments to the contrary, the Court held that the Trustees must adopt feasible mitigation measures to address significant off-campus impacts to the environment resulting from expansion of the CSU Monterey Bay campus. City of Marina, 39 Cal. 4th 341. The Court held that feasible mitigation measures include "voluntary" payments by CSU to local governments for off-campus improvements addressing drainage, water supply, traffic, wastewater management, and fire protection impacts. Id.; see also County of San Diego
CITY AND COUNTY OF SAN FRANCISCO

OFFICE OF THE CITY ATTORNEY

Letter to Mr. Richard Macias
Page 2
March 30, 2007

v. Grossmont-Cuyamaca Community College District, 141 Cal. App. 4th 86 (2006) (community college required to mitigate significant off-campus traffic impacts caused by campus expansion). The Supreme Court held that the CSU Monterey Bay EIR failed to incorporate feasible mitigation measures and vacated the Trustees' actions certifying the EIR. City of Marina, 39 Cal. 4th at 368.

In the case of off-campus environmental impacts, the payment is the mitigation, not the actual improvement or provision of service. See City of Marina, 39 Cal. 4th at 370 (concurring opinion, Chin, J.). Meaningful determination of mitigation measures (i.e., voluntary payments) must occur prior to approval of a project to the extent possible and not deferred until some future time. Guidelines Section 15126.4(a)(1)(B) (“Formulation of mitigation measures [in the context of a draft EIR] should not be deferred until some future time.”). Furthermore, City of Marina underscores CEQA's mandate that an EIR provide meaningful assurance that mitigation will in fact occur. 39 Cal. 4th at 365 (“A commitment to pay fees without any evidence that mitigation will actually occur is inadequate.”). Accordingly, the SF State EIR must include a complete, good faith determination of significant off-campus environmental impacts along with adequate formulation of voluntary payments necessary to mitigate such impacts.

Unfortunately, the SF State Draft EIR (1) lacks adequate specificity on analysis regarding the extent of potentially significant impacts, and (2) fails to provide sufficient assurance with regard to the timing and form of voluntary payments. Rather than engaging in good faith negotiations with the City, the Trustees have deferred mitigation of off-campus environmental impacts to future, uncertain negotiations.

For instance, Section 4 of the Draft EIR, Utilities and Public Services, dismisses potential impacts to off-site utility infrastructure by stating that "SFPPUC can charge the SF State campus for [necessary] upgrades under Government Code Section 54999..." It is true that a voluntary payment negotiated according to the procedure set out in [Section 54999] for the purpose of mitigating specified environmental effects could satisfy CEQA. City of Marina, 39 Cal. 4th at 361. However, Section 54999, merely authorizes payment "after agreement has been reached through negotiations..." Govt. Code Section 54999.3, subd. (b). The possibility of negotiations pursuant to Section 54999 does not satisfy CEQA's requirement that mitigation be identified prior to approval of a project and "not deferred until some future time." Guidelines Section 15126.4(a)(1)(B). SF State has not entered into negotiations with the City, let alone negotiated an agreement pursuant to Section 54999. Accordingly, mitigation measures for utility impacts have yet to be identified with requisite certainty.

Another example of improperly deferred mitigation analysis occurs in the Draft EIR traffic impacts analysis. Section 4.11.2.4 provides that if SF State cannot reduce its traffic impacts to less-than-significant levels for more than two years in a row, then "it will contribute its 'fair share'... of the cost of identified intersection improvements." This so-called mitigation is an improper deferral of mitigation measures and contrary to the holding in City of Marina because it is "a commitment to pay fees without any evidence that mitigation will actually occur..." City of Marina, 39 Cal. 4th at 365; Guidelines Section 15126.4(a)(1)(B). These and similar mitigation measures proposed in Draft EIR are inadequate because they are unsupported by substantial evidence and/or have been impermissibly deferred until some future time.

By entering into a formal agreement with the City, SF State would have flexibility to negotiate the timing and terms of future City improvements and services. The resulting agreement would satisfy CEQA by providing the City and the public with assurances regarding payment for mitigation of the Campus Master Plan off-campus impacts to the environment.
Zoning and Land Use Regulation of Non-Educational Uses

Section 4.8 of the Draft EIR provides that "[a]s a state entity, SF State is not subject to municipal land use enactments...." While SF State may enjoy some immunity from local building and zoning ordinances, that immunity is limited to activities conducted in furtherance of the educational purposes of the university. See 75 Ops. Cal. Atty. Gen. 98 (1992) (construction of faculty housing on campus exempt from Subdivision Map Act because furthers educational purposes); Board of Trustees v. City of Los Angeles, 49 Cal. App. 3d 45, 49-50 (1975) (private circus operation on CSU Northridge campus was proprietary activity having no relation to educational purposes and therefore subject to local land use controls). Furthermore, activities and leases solely for the purpose of raising revenue are subject to local building and zoning regulations. 68 Ops. Cal. Atty. Gen. 114 (1985) (rejecting notion that private, proprietary activities are immune from local building and zoning ordinances "merely because the state happens to be their landlord").

The Campus Master Plan proposes construction of a hotel/conference center and "main street" retail uses as part of the SF State expansion. City land use controls are likely to apply to some aspects of these uses. The City expects that SF State will coordinate with the City in order to "assure that mutual [land use] interests are addressed." Draft EIR at Section 4.8.

Thank you for the opportunity to comment on the Draft EIR for the proposed SF State Campus Master Plan. We look forward to working with the Trustees on the mitigation measures.

Very truly yours,

DENNIS J. HERRERA
City Attorney

Andrew W. Garth
Deputy City Attorney
Response to Comment Letter 2F

Response to Comments 2F-1 and 2F-2. The University has performed an appropriate program-level analysis of the potential environmental impacts of growth proposed under the Campus Master Plan. Please see Master Response 9, Program vs. Project-Level EIR Analysis for additional information about the programmatic approach used in developing the EIR.

The University believes that it has met its CEQA obligations to mitigate the potentially significant environmental impacts of growth and development under the Campus Master Plan. Where potentially significant off-campus impacts of the project have been identified (i.e., traffic and transit), the EIR recommends appropriate mitigation measures that would be implemented (see Mitigations TRA-1, TRA-2A through TRA-2C). Where these measures involve off-campus improvements under the jurisdiction of another agency (e.g., Mitigation TRA-1), the University would contribute its fair share to those improvements, assuming they are ultimately determined to be needed, based on identified performance standards. See Master Response 15, Transportation Impacts, for further information.

Where the University’s fair share of the construction of off-campus improvements would be covered under Government Code 54999 (e.g., water and sewer improvements), the EIR does not list these improvements as mitigation measures. The commitment to comply with this statute is a legal obligation with which SF State must comply irrespective of environmental impact mitigation commitments made in the EIR. It should also be noted that significant impacts on the physical environment have not been identified related to utilities based on the applicable CEQA standards of significant. See Master Response 16, Water and Wastewater, and response to Letter 2B for further information.

In response to this comment, however, the University is engaged in discussions with the City regarding any anticipated off-campus impacts and will continue to do so in good faith in an effort to reach a mutually agreeable resolution on any points of contention. The University has been conducting its discussions with the City through the Mayor’s Office, pursuant to these comments.

Response to Comment 2F-3. Please see Master Response 8, Local Control Over Campus Land Uses, for a response to this comment.
March 40, 2007

Richard Madas
Capital Planning, Design & Construction
San Francisco State University
1600 Holloway Avenue
San Francisco, CA 94132-4021.

Re: SF State Master Plan EIR / Significant effects on Cultural and Historic Resources

Dear Mr. Madas,

Docomomo is an international organization dedicated to the preservation and significance of the modern movement in architecture and landscape design. The Northern California chapter of Docomomo (Docomomo NoCa) was established in 1996 as a non-profit 501(c)(3) organization, and its mission has been to promote education and awareness of the modern movement.

The Northern California chapter of Docomomo has done extensive research on the history and design of Park Merced, and has been conducting tours of the area, independently and in conjunction with SFUH since the past eight years. We consider Park Merced to have a high degree of architectural and historic significance, as well as a high level of integrity. The area now called "University Park South" is an integral part of the Park Merced development.

Park Merced is an important milestone in the career of the noted and influential landscape architect Thomas D. Church. It was his first large-scale design and construction project, which occupied him and his office for several years. While he collaborated with architect Leonard Schultze on the development site plan, his authorship of the masterful landscape design is unquestioned. No subsequent landscape architects were employed or have made changes to the original design. The urban landscape of Park Merced was created as an integral function to the primary use, housing. Its significance lies in the further development of the American version of garden city ideas by Schultze in close cooperation with Church, and Church's design and execution of the garden courts, public open spaces and street system using new forms and native plants.

The proposed SF State Campus Master Plan has highly significant negative impacts on the historic fabric of Park Merced by the demolition of many urban blocks that include historically and architecturally significant historic buildings and landscape. Because the existing buildings and landscape in the Park Merced blocks that have been purchased by SF State already function well as housing, Docomomo NoCa strongly believes that should be retained in their existing configuration, and that the Alternatives that demolish these blocks do not adequately address their historic significance. Docomomo NoCa strongly supports the development of an Alternative that does not demolish the Park Merced blocks, such as Alternative 1 (Reduced Housing Growth).

Sincerely,

Andrew Wolfram
President, Docomomo US/ Northern California Chapter
PO Box 29226
San Francisco, CA 94129
Response to Comment Letter 3

Response to Comments 3-1 through 3-4. Please see Master Response 13, *Parkmerced Historical Resource Impacts*, for responses to these comments.