Comment Letter 4

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Americans Committed to Conservation • A Chapter of the National Audubon Society

2945 Ulloa St.
San Francisco, CA 94112
March 28, 2007

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

Re: San Francisco State University Master Plan Draft EIR

Mr. Macias:
The Golden Gate Audubon Society, representing about 6000 members in San Francisco and the Bay Area, thank you for the opportunity to comment on the San Francisco State University Master Plan Draft Environmental Impact Report. In brief, our comments are directed at elements concerning birds and other wildlife, habitat, and soils and hydrology.

We are very please to see the plan calls for sustainable practices. Our comments point out where we think that focus was lost. We are very pleased with the element to create a greenbelt between 19th Ave and Lake Merced. Daylighting the creek, establishing a means to help recharge the aquifer and supplying water to Lake Merced are excellent goals and we support them. We are deeply concerned the plan does not seem to have anticipated erosion problems associated with the project, particularly between Lake Merced Blvd and the lake. The single element of the plan with which we disagree is the construction of the pedestrian path between Lake Merced Blvd and the lake's edge. Our comments give detailed and repeated reasoning for our position on this particular issue.

Our comments are presented sequentially, but they do cross from Chapter 2 to Chapter 4 and back again. We have made every effort to structure those comments so they can be applied to both chapters by citing page numbers for either or both chapters. The absence of a hard copy of the master plan made this somewhat challenging. We apologize for any inconvenience this may cause you in working with these comments.

There is on element that is not included in this plan that we suggest will make it a much stronger document and will help assure its implementation. We strongly recommend that this master plan receive an annual review that is published for public information and comment. It is our belief this will allow the public to remain involved in the progress of the plan, and it will provide university managers an improved formula to help them most adopted objectives. It will also offer a means for the university managers and the public to monitor master plan progress and to employ adaptive management procedures through the course of the plan.

Again, thank you for the opportunity to comment on this plan. We look forward to seeing it's successful implementation. If there is anything we can do to clarify our comments or to provide advice, please fell free to contact us.

Attached are our comments on the Master Plan Environmental Impact Report.

Very truly yours,

Daniel P. Murphy
Conservation Committee
Golden Gate Audubon Society
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Berkeley, CA 94702

Comments Regarding the San Francisco State University Master Plan Draft EIR

Prepared by Daniel P. Murphy
GGAS Conservation Committee
March 28, 2007

NOTE: These comments are critical of this planning document for errors regarding heron and cormorant use of the eastern part of Lake Merced. When those comments were prepared, there was no evidence of nesting in previous years. The project area has been surveyed for nests in previous years and none were located. However, on March 24, 2007 a Great Blue Heron colony with 3 active nests was locate in a eucalyptus grove on the Mesa at the end of Middlefield Dr. This morning, March 28, three Double-crested Cormorants were observed roosting in the grove. This is not an indication of nesting. This colony will be monitored as part of an ongoing heron and cormorant survey conducted by the San Francisco Bay Bird Observatory.

2.3 PROJECT OBJECTIVES

p. 2-3 A continuous greenbelt between 19th Avenue and Lake Merced
Establish the valley as the central open space of campus
Provide expanded recreational facilities
Restore ecological landscapes in the valley.

p. 2-4 A campus that models sustainability
Promote sustainability through green building and site design, native landscape, natural stormwater management, alternative transportation, high density housing and valuable neighborhood retail.

2.6 KNOWN AREAS OF CONTROVERSY
There is no mention of impacts on Lake Merced and that should be mentioned here.

p. 2-7 Table 2-1 GGAS supports mitigation measures regarding Monterey Cypress and Monterey Pine on campus. We would urge that a snag management element be added to this element of the plan. Such a plan would be consistent with the objective to have an environmentally sustainable campus. Snags provide a critical nesting, roosting and feeding habitat for many birds that inhabit all park like areas of San Francisco. Downy Woodpecker, Pygmy Nuthatch and Brown Creeper are three nesting species that depend on snags and are known to reside on campus.
A snag policy should designate protection dead branches and standing dead trees in areas where they are not a threat to people or buildings. Such a plan might include trimming of longer snags, but this is not as beneficial to wildlife as untrimmed branches. The presence of standing dead trees may not be practical in most cases, but development of criteria for assessing dead trees and allowing some to stand would be valuable to wildlife.

p. 2-8 AES-4A
GGAS applauds the proposal to use LEED-NC guidelines for reducing lighting pollution. We suggest only that as those guidelines change to reduce the impact of night lighting even more, that the mitigation measure should be adapted to meet the most recent guidelines, not just those in place at the time of the Master Plan’s adoption.

AES-4B
GGAS is very pleased to see the use of reflective material will not be used on building facades. It is also important to note that this should be extended to design features when glass is used on lower floors of buildings. Studies in New York City indicate migrating birds often fly into windows that either reflect vegetation outside buildings or give the appearance that birds can fly to vegetation within the building. We urge that design criteria be developed to help mitigate this problem.

p. 2-10 and p. 4.3-10 Biological Resources
BIO-1A This mitigation measure makes assumptions that are inconsistent with present plans for Lake Merced, extend beyond existing plans and appear to supercede the Lake Merced Watershed Master Plan presently in development.

It is a fine idea to connect campus to Lake Merced with a creek and with access by a bridge underpass. However, public access should end at the perimeter path, not at the lake’s edge. The sand banks in that area are far too steep and unstable to allow access. Access would cause a new source of erosion, the cumulative impacts of which probably cannot be determined. It is not desirable for the public to have ready access to the SF PUC infrastructure at the bottom of the hill. Impacts on the marsh and wildlife would be serious simply because they are so isolated now, that introducing a human presence at lake level would be completely inconsistent with other elements of this plan regarding environmental sustainability. It is simply impossible to bring people to lake level, at the bottom of a steep sand bluff, into a dense marsh, and suggest it will be without impact. Drop this public access element from the plan.

BIO-1B The mitigation plans appear fine as far as they go, but there is no mention of erosion control or project timing. Should public access end at the perimeter path be eliminated from this plan, focus must be on impacts of flood waters that escape the creek channel on the sand bank. That is a problem
around the lake and will be here as well. Should public access be approved, an
element needs to be developed to deal with human caused erosion issues. In
either case this needs to be a permanent aspect of maintenance, not one that
involves monitoring for a few years and then abandonment. It is of great concern
there that there is no consideration of the engineering that created the
geographic structure at the foot of the valley. The roadways that are Lake
Merced Blvd. and Winston Dr were constructed between the mid 1920's and the
late 1940's and filled the creek bed and the eastern arm of the lake. An
engineering assessment needs to be undertaken to determine if the
unconsolidated sand bank at the east end of Lake Merced is sustainable under
some or all of the elements of this plan.

Discussion of restoration of wetlands seems to mask the need to restore
additional elements of the project site. Much of the most seriously impacted area
would be on the lake's bank. It would seem prudent, and it would add to the
sustainability of the plan, to add an element to introduce native riparian
vegetation along the course of the creek and to restore adjacent areas with
native plants coastal scrub plants drawn from local seed banks and cuttings.
This should be part of an engineering plan to resist erosion.

Consultation with agencies seems appropriate, but it does not go far enough.
There are a large number of stakeholders at Lake Merced. Many are
represented on the Lake Merced Task Force. Others are not, but should be
involved when considering elements of this plan. Consultation with stakeholders
and agencies should govern how mitigation and other project elements are
undertaken. A specific plan for follow-up of these mitigation measures needs to
be developed and included in this document. We are not asking for dates, but a
statement of when specific benchmarks will be reached after the the after the project
begins. Feedback should be made to public agencies, stakeholders and
published in the local press.

It is critically important for the construction element of this project on the west
side of Lake Merced Blvd. to begin between September 1 and February 1. The
time frame between February 15 and August 15 marks the usually parameters of
the bird nesting season in San Francisco. Should raptors, herons or cormorants
nest in the project site the project timing should be adapted to assure nests are
not destroyed or abandoned.

BIO-1C It is interesting that the agency presently responsible for stewardship
and restoration of Lake Merced's banks is specifically not mentioned in this
document. The San Francisco Recreation and Parks Department and its Natural
Areas Program is presently managing several restoration sites around the lake.
They must be part of this program. Should there be an eventual change in
management responsibilities, it will be essential to involve any agency involved in
restoration and stewardship at the lake.
An additional bullet point needs to be added to the end of this section. It should state that erosion control will be part of the plan, that SFSU will be responsible for it in conjunction with City agencies, and that the SFSU will have ongoing responsibility for erosion control in the project site.

Though GGAS generally does not comment on matters dealing with infrastructure like the pipes along the shoreline between the proposed project and the lake's shoreline, we feel compelled to question why they are not mentioned in this section. It seems it will be necessary to fill over them or route the creek beneath them. That element of the plan needs to be spelled out and the mitigations need to be developed.

p. 4.3-12 Impacts on Wetlands and Other Sensitive Habitats
While supporting the principal of recharging ground water and allowing some run-off to reach the lake, GGAS opposes the construction of a pedestrian and bike path into the marsh at the site described in this plan. This is an almost totally isolated site where wildlife can live with as little impact from humans as possible in a city. It is worth protecting. This element of the plan is not sustainable. In fact it promises to destroy critical habitat and should be dropped from the plan.

GGAS also takes issue with the presumption that this plan can go forward without public input for the element that impacts the area between the perimeter path and the lake's shoreline. To suggest this will be done in consultation with the SF PUC ignores the fact numerous stakeholders should have a voice in this matter. It is inconsistent with procedures and process which have been in place in San Francisco for over a quarter century. It is unacceptable.

The statement that the impact of this plan is temporary is incorrect. It is permanent in all its elements. Even the creek will create a permanent change to the environment of the lake. We believe that change will be positive if it is done correctly. As stated above, we believe public access to the shoreline will be negative and permanent. We wish these two elements of the plan were separated because it makes commenting on this element of the plan very difficult. This is an area that needs an adaptive management element. It needs to state standards or milestones for success or failure and needs to include a formula for changing elements of the plan that fail to meet the plan's objectives.

P. 4.3-14
We applaud the plan to install bioswales to help purify runoff. We hope that will be monitored on an ongoing basis and improved as problems develop. Adaptive management and progress reporting is critical here because it can help assure the continued viability of the lake's water quality and what can be shown to work here can be applied elsewhere. Given the unique geology of the project site, manipulated sand dunes and unnaturally steep slopes near the lake's edge, this is a most significant restoration site. The single element that is missing is a state
plan to deal with erosion. That is a proven problem around the entire perimeter of the lake and it must be addressed here.

BIO-2A It is important to be specific in this section. First, nesting season at Lake Merced begins by February 15. In 2007, at least 6 pairs of Great Blue Herons were on nests by that date. Three pairs of Double-crested Cormorants were as well. These are both species that use the project zone during the nesting season. It is generally considered that the nesting season in San Francisco begins around Feb 15 and ends around July 15. Each year differs, so annual variation needs to be considered.

We do have special status birds that are likely to nest in this area. The "San Francisco" Common Yellowthroat is a resident of this lake. Its numbers appear to vary. A thorough evaluation of the lake's yellowthroat population has never been carried out. Surveys in the past have been timed either at the end of the nesting season or there were so few surveys that they were unlikely to identify a significant number of territories as defined by the presence of a singing male over several visits or birds carrying nesting material or fecal sacs.

The Golden Gate Audubon Society has long held that no project that can be projected to have significant negative impacts on nesting birds or sensitive habitats should begin after mid February. We hope that with this "sustainable" plan, such a time line will be used regardless of the final project elements.

The use of a breeding bird survey two weeks prior to the beginning of a project represents a practice that is neither sustainable nor habitat sensitive. In spring, birds claim territories very rapidly. In the case of many species, birds may migrate in, establish territories, build nests and lay eggs within the period of two weeks. The most likely to be impacted by the proposed 2-week window would be Allen's Hummingbird. It migrates early and is very quick to become established as a nesting species. The simple solution to this is to schedule the start of work between early August and early February.

BIO-2B Signage is not a satisfactory mitigation measure to deal with off trail use of the area between Lake Merced Blvd and the lake. Should public access be permitted to the lake's edge, SFSU should be responsible for expenses associated with erosion. They should also assume responsibility for patrolling the area and keeping people on trails.

P. 4.3-14 Direct Impacts to Nesting Habitat
Since the nesting survey reported in this document was carried out after the nesting season, the section regarding impacts on campus is questionable. It should be noted that the most likely species to nest on campus is Red-shouldered Hawk. That species nesting behavior is characterized by building a
relatively small stick nest and perhaps one or more false nests. They do reuse nests for many years. The solution to this problem is to do all tree removal during the fall or winter. Perhaps the best window would be during winter break. Nesting would not be an issue at that time and the campus student population would be low.

Impacts on nesting birds at Lake Merced are likely to be limited, particularly if all projects take place between August and February. If this plan is going to be sustainable no projects should start after Feb 15. Ongoing projects should be completed as scheduled.

Please remember that on March 24, 2007, a colony of 3 Great Blue Heron nests was located in the eucalyptus grove on the Mesa. That site is directly west of the end of the project zone. Considering that Great Blue Herons are known to have nested at Lake Merced for only 11 years, it should be noted this is the first documented for the eastern part of North Lake, or the East Lake as it is sometimes known. It is unknown why the birds selected this site, but disturbance at other sites cannot be dismissed. The Mesa colony is subject to much less disturbance than the established South Lake and the North Lake colonies. This is a factor that must be considered when the implementation of the project phase west of Lake Merced Blvd. is developed. Perhaps the most important thing will be to time the project so it does not disrupt the nesting cycle at this Great Blue Heron colony.

P 4.3-16
GGAS takes extreme exception with the idea of constructing pedestrian and bicycle access into the riparian and marsh zones of Lake Merced. As stated repeatedly in this response, this will be a significant and permanent impact on the lake, its vegetation and its wildlife. The site proposed for access is just wrong. It seems to be the responsibility of SFSU to do a thorough engineering study of the project site and to develop an adaptive management plan that includes milestones for acceptable and unacceptable levels of impact from bikers and pedestrians. This should extend to the point of removing the access if it fails. Funding for that level of mitigation should be budgeted in the overall project budget.

BIO-3 We don’t know if mitigation is necessary in this area or not. A Lake Merced Watershed Plan is being developed presently. There is a new circulation plan for the lake that was made public recently. Both should be reviewed for conflicts prior to assuming mitigation is not required.

P 4.3-17
In reference to BIO-3, the conclusion that the impact would be less than significant is incorrect. For better or worse, impacts would be significant. In the absence of a specific adaptive management plan there is not even an opportunity to correct the most negative of the unanticipated impacts.
BIO-4 While impacts may be limited to special status species, this plan does not account for impacts on species that are experiencing local population declines. It does not address means of actually improving habitat either. It seems unlikely the aspects of the plan on the building footprint of campus will have a significant impact unless tree cutting takes place during the nesting season. The element of the plan that is likely to pose significant habitat impacts is public access to the lake's shore at the east end of North Lake. Construction of a creek at that area would pose an impact, but mitigation as suggested previously would probably be adequate.

p. 2-18 GEO-2 The assertion in 4.5.2 that "development under the proposed Campus Master Plan will not result in substantial erosion of soils during construction" may be true, but what will be the impact after construction when berms, temporary grading and other active construction barriers to erosion are not in place? Evident around the entire shore of Lake Merced are extreme examples of erosion. Some are the result of sheet flows that washed through non native vegetation and washed large amounts of sediment from the shoreline into the lake. Lesser erosive events have occurred through stands of willow and other native vegetation. Falling trees along the edge of Harding Golf Course and along the lake's steep shoreline have taken huge amounts of sand into the lake with them. During the recent renovation of the golf course, failed engineering near this project site resulted in a massive erosive event on the 10th fairway. The entire fairway slumped and the bank gave way sending a considerable amount of sediment into the lake. It was costly to fix, destroyed the habitat between the fairway and the lake and resulted in the delay of the opening of Harding Golf Course. Failure to maintain infrastructure has resulted in some erosion. Finally, the use of informal trails has caused erosion.

It is alarming that this plan does not address matters associated with erosion in an area that is built on dunes and fill. The element of the plan to construct the creek along the north edge of campus needs to be addressed in this master plan. Since the creek will not follow its original course, but a constructed one, it is necessary to define the creek's course. It is necessary to view this as another construction element, just like the construction of new buildings. A discussion of how the creek's bed will be laid is critical. Will it be in a concrete channel, a sand channel, or a combination of both? How will water be allowed to pool and seep into the aquifer? Will that have any impact on existing structures? How will the creek channel contain high water? What will be done to control meandering? Should the original engineering of the creek fail, what elements will trigger action and what adaptive management alternatives will be considered for implementation?

4.7 Hydrology We are pleased to see that monitoring for water quality at or near the discharge point in Lake Merced will be part of this plan. It should be stated that will be a permanent responsibility of SFSU. Though we are inclined to
concur that there will be little if any impact on the aquifer and water quality from this project, we would urge that at least one monitoring well be placed on the SFSU campus in the area of the creek to assure that is the case. Monitoring of hydrology is important too, particularly in the context of erosion as we mentioned previously. GGAS views this creek as an excellent opportunity to demonstrate that creeks that have long been constrained in underground culverts can be daylighted and the waters they carry can once again benefit the environment of San Francisco.

P. 4.3-5 The second to last paragraph understates the recreational value of Lake Merced. It is one of San Francisco's most significant birding sites. Though the previous paragraph does a fine job of acknowledging it's habitat value, this paragraph completely ignores it's value as a resource for nature study. Significant numbers of birders visit the lake both on their own and as part of organized groups. Others use the lake to observe residual dune wildflowers. Habitat restoration is a significant recreation for many others.

The following paragraph under states the habitat value of the surrounding neighborhoods. They do in fact support some habitat. Sunset Blvd. and Brotherhood Way provide habitat corridors for wildlife moving through the city. Back yards provide the same resource for many small mammals, birds, reptiles, amphibians, and insects. Perhaps it would be better to mention the value of wildlife corridors and habitats of less than optimal value. Scattered parks provide islands of habitat nearby. All open ground provides significant areas for recharging the aquifer, a seldom considered, but critical element of habitat value. The suggestion that the neighborhoods do not support any natural habitat is misleading. The natural habitat for this area is dune, coastal scrub and some oak woodlands. That habitat has been replaced with an exotic habitat to which remaining wildlife has adapted.

4.3-7 In referring to the lack of nesting raptors on the SFSU campus it should be noted that any breeding bird survey conducted in San Francisco in August is completely invalid. Nesting in San Francisco begins as early as February for raptors. By March both Red-tailed and Red-shouldered Hawks have established territories and are probably sitting on eggs. Fledging takes place in May and June. Cooper's Hawks generally require denser nesting habitat than what is available on campus. Only a single American Kestrel nest was found in San Francisco in 2006. White-tailed Kite does not occur regularly in San Francisco. Though they are observed flying into San Francisco from the Marin Headlands during fall migration they are seldom seen in the City. We generally have 1 sighting not related to fall migration about every 5 years. Considering the distribution of hawks in San Francisco, it is possible, but unlikely that Red-tailed Hawks nest on campus. It is likely Red-shouldered Hawks nest there. Nests are usually easily located in tall trees prior to hatching. The adults are highly vocal until they have young. At that point they stop vocalizing for the most part and are subsequently difficult to locate.
Lake Merced Special Status Birds carries some incorrect information. The heron and cormorant colony on the west shore of the North Lake is not mentioned. The reported nesting colony below the Mesa has been reported for at least 2 years, but repeated surveys designed specifically to locate it indicated the reports were false. No nests were located and there was no damage to trees as one would expect in a heron or cormorant colony. Cormorants do in fact roost in the eucalyptus in question and they feed in the waters in the eastern part of the lake. A Great Blue Heron was reported possibly nesting on the shoreline below the 10th Fairway of Harding Golf Course in 2006. Subsequent surveys of the area failed to find a nest or juvenile birds. An adult bird was observed feeding in the area.

GGAS wishes to express its concern that this paragraph contradicts information and conclusions presented in Table 4.3-1. Consistency is critical if this document is to be believed. We urge that corrections be made.

P. 4.3-8 Wildlife Movement
We take exception with the characterization that the SFSU campus is not a wildlife corridor. It is. Mammals including raccoon, striped skunk, opossum, red fox, gray fox, and coyote move through it at night. Birds and some insects utilize it as a corridor between the Lake Merced system and the interior. That said, we concur that it does not need further consideration in this document unless there is a desire to add that the construction of a creek on campus will increase the value of this corridor.

P. 4.3-9 Analytical Method
Though we find little problem with this document in relation to the SFSU campus footprint, we take exception to the method in reference to Lake Merced itself. Should the project to extend the creek and public access to the lakes shoreline be implemented the methodology is simply inadequate. We will discuss this in detail following our comments regarding Table 4.3-1.

4.3.2.3 Campus Master Plan Impacts and Mitigation Measures

Table 4.3-1
There are several errors of which we are aware in this table. Our comments only apply to birds, but if we found such errors in relation to birds, we question the validity of the statements about other organisms. Research for potential occurrence in the project area is far too limited. It ignores recent publications that document breeding bird use of the area. There is another problem that may be in the eye of this reviewer. A definition of "project vicinity" was never provided. There is no possibility this project will impact whales. Likewise there is no chance it will impact species unknown to have ever occurred at the lake. This misrepresents and trivializes the actual status of birds, and probably other organisms, that occur in the actual area likely to be impacted by the project. The fact that the authors are not aware there was a Double-crested Cormorant
population of 283 pairs on nests in 2006 brings into question much of the data underlying the biological assumptions in this document. Utilizing dated, cursory and incomplete documentation designed to identify species ranges and not actual population densities by CDFG is simply unacceptable.

Cooper’s Hawk: this species is a fairly common winter resident at Lake Merced and the vicinity. They hunt in parklands including all areas around SFSU. They also hunt in urban neighborhoods where bird feeders are present or birds concentrate in significant numbers. Cooper’s Hawk have been heard and seen in the vicinity of the 10th Fairway of Harding Golf Course during the nesting season. They are known to be increasing as a breeding species in San Francisco. There is a high probability they occur on the entire project site between September and April. If they nest on Harding Park during the project time frame, there is an equally high probability they will occur in the project area. The status is Likely to Occur.

Western Snowy Plover: There very likely no records for this species within the project area. Since the project vicinity apparently extends into the Pacific Ocean, there are far more than 2 records in that vicinity. Western Snowy Plovers have been documented on Ocean Beach for at least the past 50 years. There are presently 25-35+/- that winter along Ocean Beach. There no habitat present for Western Snowy Plover. The status is No Potential to Occur.

Common “Salt Marsh” Yellowthroat is a fairly common resident at Lake Merced. Confirmed numbers of breeding pairs ranges from 2 to 8 during the past 10 years or so. These numbers are very low because of limited surveys and inadequate survey protocols. Formal surveys were carried out too late in the season to find singing birds on territories. Other surveys were land based and did not have access to over half of the habitat that is suitable for Yellowthroat nesting. All we really know about Common Yellowthroat nesting at Lake Merced is that they nest there annually. It is certain they occur in greater numbers than any survey suggests. The margin of error can only be a matter of speculation. There is a high probability this species occurs in the project area of Lake Merced. Habitat along the lake’s shoreline where the proposed creek would enter the lake and significant shoreline disturbance would occur is excellent habitat for yellowthroat nesting. There is also a probability they occur on the campus part of the project area during post breeding disbursal. This should not be a major factor, but it should be acknowledged. The status is Likely to Occur.

Bald Eagle: There is at least one record for Bald Eagle at Lake Merced during the past year. It was a fly-over during migration. There is a very low potential for this species to occur in the project area. The status is No Potential to Occur.

Brown Pelican: The potential for occurrence is incorrect. Brown Pelicans occur in the vicinity of the project annually between April and December. They are uncommon between January and March. This species has been observed on
the fresh waters of Lake Merced in increasing numbers during recent years. Their primary use of the lake appears to be for resting. They have not been observed in the actual project area. This is more difficult to assess. In terms of Lake Merced, Brown Pelican’s status is Likely to occur in the North Lake. The status on the East Lake is Not Likely to Occur.

Double-crested Cormorant: Potential for occurrence is likely to occur. In 2006 a survey conducted by the San Francisco Bay Bird Observatory located 283 nests in colonies on the South and North Lakes. A roosting site is in the eucalyptus directly west of the project site. Double-crested Cormorants feed and dive for nesting material in the zone that would be impacted by the project. It is important to acknowledge that most cormorant activity is focused on North and South Lakes for gathering nesting material and on the ocean for feeding during nesting season. It is equally important to acknowledge that some birds do feed in the coves and open water in the East Lake. There is a potential they will nest in the eucalyptus on the Mesa during the course of the project. Their status is Likely to Occur.

Bank Swallow: Here again is a significant blunder that matches the misinformation expressed about Double-crested Cormorants. Historically Bank Swallows were known to breed at Lake Merced since the 19th Century. Presently, there is a colony of about 150 nesting burrows on the ocean facing sand bluffs at Fort Funston. It is one of only 3 remaining Bank Swallow colonies remaining on the California coast. It is also the largest. Those swallows feed over all of Lake Merced between April and the end of July. It is critical habitat for them and without it the colony would be lost. To make your documentation worse, the 3 documented occurrences referred to apparently refer to inadequate surveys. There are published records for this species dating back to the early 1900’s and they are confirmed reports for every year since about 1920. The status in the vicinity and on the project site is Likely to Occur.

This ends our comments on the EIR.
Response to Comment Letter 4

Response to Comment 4-1. Comment noted.

Response to Comments 4-2 through 4-4. Please refer to Master Response 12, Biological Resource Impacts and other responses to this letter below.

Response to Comment 4-5. Please refer to Master Response 12, Biological Resource Impacts. Please also refer to Chapter 3, Changes to the Draft EIR.

Response to Comment 4-6. Text has been revised in response to the comment about “Known Areas of Controversy.” Please also refer to Chapter 3, Changes to the Draft EIR.

The referenced mitigation measure, Mitigation AES-1A through 1-C, applies only to the small groves of Monterey Cypress and Monterey Pines located in and around the Campus Core landscape zone that constitute scenic resources on the campus. Maintaining snags in this area of campus would have public safety and aesthetic implications. However, the campus has indicated that it will examine a snag management element as part of the valley greenbelt landscape plans. It should be noted that the Campus Master Plan calls for the development of a landscape master plan and landscape maintenance guidelines (see Campus Master Plan page 121). Such a snag management element will be contemplated during the preparation of these plans.

Response to Comment 4-7. Text has been revised in response to the comment. Please refer to Chapter 3, Changes to the Draft EIR.

Response to Comment 4-8. The campus is aware that conservationists and architects are studying building design solutions to minimize or prevent birds crashing into glass windows. Solutions such as turning building lights off at night, eliminating the use of mirrored glass, installing "fritted" panes that use small dots of opaque glass to achieve a semifrosted look, installing windows at downward angles so they reflect the ground, and/or using recessed windows to reduce reflections, are just some of the solutions being explored.

It should be noted that the implementation of Mitigation AES-4A will require that new campus lighting will be consistent with the most recent LEED-NC guidelines, which includes the use of automatically controlled turn off of lighting in interior spaces during non-business hours. Mitigation AES-4B also indicates that mirrored glass will not be used as primary building materials for facades. Additionally, during the planning and design of future projects, the University will explore the use of other design approaches for addressing this issue, such as but not limited to the examples listed above.

Response to Comments 4-9 through 4-11. Please refer to Master Response 12, Biological Resource Impacts.
Response to Comment 4-12. Please refer to Master Response 12, Biological Resource Impacts. Revised Mitigation BIO-1B will ensure that any disturbed/removed habitat is replaced in accordance with the SFPUC through its subsequent approval process and all regulatory permit requirements. Consultation with all involved agencies shall govern how the disturbance of wetlands and other sensitive habitats will be mitigated, including the location and extent of wetland restoration and creation, and planting and management specifications (e.g., success criteria, monitoring, etc.). See Chapter 3, Changes to the Draft EIR, for revised mitigation language.

Also, as noted on Draft EIR page 4.3-12 the proposed Campus Master Plan storm water management and landscaping plans would result in the creation of new wetland-type habitat along the creek that will run through the valley portion of the campus. The new creek will consist of a riparian corridor, including plants typical of coastal creeks in the area with a predominance of willow in low areas and hardwoods as the banks of the creek begin to rise. The connection of the new creek to the East Lake portion of Lake Merced will connect this riparian corridor to the lake habitats, which will increase overall habitat diversity in the area.

Response to Comments 4-13 through 4-19. Please refer to Master Response 12, Biological Resource Impacts. Please also see Chapter 3, Changes to the Draft EIR.

Response to Comment 4-20. Draft EIR Mitigation HYDRO-1 calls for monitoring stormwater discharges to Lake Merced (see page 4.7-5). Please also refer to Master Response 12, Biological Resource Impacts.

Response to Comments 4-21 through 4-24. Please refer to Master Response 12, Biological Resource Impacts. Please also see Chapter 3, Changes to the Draft EIR.

Response to Comment 4-25. Please refer to Master Response 12, Biological Resource Impacts. In addition to the use of signage, Mitigation BIO-2B also calls for other design features (e.g., fencing) to keep people on the path. Please also see Chapter 3, Changes to the Draft EIR.

Response to Comment 4-26. The August 2006 survey of the campus was not intended to be a clearance-level survey, but was rather a reconnaissance-level survey conducted for the purpose of identifying habitat potential for special-status species, including birds. Habitat potential for special-status species on the campus is evaluated in part based on this survey (see Draft EIR Table 4.3-1). The Draft EIR identifies red-shouldered hawk as a more common species that may occur on campus (see page 4.3-7. Please also see Chapter 3, Changes to the Draft EIR, for revised mitigations related to nesting birds.

Response to Comment 4-27. Comment noted. Please also see Chapter 3, Changes to the Draft EIR, for revised mitigations related to nesting birds.
Response to Comments 4-28 and 4-29. Please refer to Master Response 12, Biological Resource Impacts.

Response to Comment 4-30. The CEQA standard of significance being evaluated in Impact BIO-3 addresses adopted Habitat Conservation Plans (HCP) under the Federal Endangered Species Act and Natural Community Conservation Plan (NCCP) under the California Endangered Species Act. As indicated on Draft EIR page 4.3-17, the campus does not fall within the boundaries of an adopted HCP or NCCP, nor is it adjacent to any properties that have such an adopted plan. Therefore, there is no potential that the implementation of the proposed Campus Master Plan would result in conflicts with an adopted HCP or NCCP.

To be conservative, this impact analysis was extended to the Significant Natural Resource Areas Management Plan, which is in place for the Lake Merced Natural Area, as it is an adopted plan for the management and conservation of the areas natural resources.

The Lake Merced Watershed Plan mentioned in the comment is not available in draft form, nor is it adopted. Additionally, it is unclear how it will relate to the Natural Areas plan above. The circulation plan mentioned in the comment is not a plan for the management and conservation of the areas natural resources. For the above reasons, neither of these plans was evaluated in the Draft EIR as part of Impact BIO-3. However, the Master Plan team used the referenced circulation plan in laying out the SF State path connection.

Response to Comments 4-31 through 4-34. Please refer to Master Response 12, Biological Resource Impacts. Please also see Chapter 3, Changes to the Draft EIR.

Response to Comment 4-35. Please refer to Response to Comment 2B-6, which elaborates on potential groundwater effects of the project. There is no evidence to support the need for a groundwater monitoring well on the SF State campus. Please also refer to Master Response 12, Biological Resource Impacts and Chapter 3, Changes to the Draft EIR.

Response to Comment 4-36. Comment noted. It is acknowledged that birding and nature study are popular recreational activities around the lake. Please see Chapter 3, Changes to the Draft EIR.

Response to Comment 4-37. It is acknowledged that habitat value does exist in surrounding neighborhoods on patches or corridors of exotic habitat. The Draft EIR simply indicates that these areas do not contain natural habitat.

Response to Comment 4-38. Please see Response to Comment 4-26. Please also refer to Master Response 12, Biological Resource Impacts. Please also see Chapter 3, Changes to the Draft EIR.

Response to Comment 4-39. Comment noted.
Response to Comments 4-40 through 4-49. Please also refer to Master Response 12, *Biological Resource Impacts*. Please also see Chapter 3, *Changes to the Draft EIR*.
LAKESHORE ACRES IMPROVEMENT CLUB
P.O. Box 320222
San Francisco, California 94132-0222

March 9, 2007

Richard Macias
Capital Planning
San Francisco State University
1600 Holloway Avenue
San Francisco, CA 94132

Dear Mr. Macias,

I attended the hearing on March 6 but did not speak. The introduction and presentation of the Master Plan took so much time there was not time for all to speak. I had previously submitted to you our concerns but they were not addressed in the presentation nor were the even more serious concerns of the Merced Manor residents. The introductory presentation was a rosy picture and not a serious presentation of the issues.

In several places of the Plan is stated the desire of SFSU to integrate into the community, and your neighbor, Stonetown, that has a multitude of services was mentioned. Later is stated that retail business streets are to be developed including a hotel so as to be self-sufficient. Downtown San Francisco has many hotels and convention facilities within easy reach of public and personal transportation. You do not address the traffic, parking, and police problems that will be increased in our residential area.

Packing is described as an obstacle to growth due to the inability to provide affordable parking. The present $5 per day fee, even now unaffordable for students, will be $20 per day unless subsidized. You stated that the residential streets are for public use and that students have as much right to park there as anyone. That is correct but the inappropriate use of residential parking as a student all day parking lot rests solely on SFSU. Your remedy is to force the residents to petition for restricted residential parking at $60/year cost. Not all residents will desire that. If I get restricted parking in front of my home then the students will go to the next block to park and then use their skate board or bike to go to the campus.

The 20,000 students claimed are really 29,000 actual students at present. They are not usually all there at the same time but there are times when most are on campus. Alternatives have not been presented such as a satellite campus downtown or elsewhere or even a new university in the San Francisco Bay Area. Achieving excellence is not a function of size. At present SFSU is larger than UC Berkeley in my day and there was no problem with excellence then.

We suggest that before enrollment is increased or commercial development is begun, an effort is made to ameliorate some of the adverse effects on the surrounding community of the present size of SFSU.

Respectfully,

Donatis

Chris Mansis, chairman
506 Geary Dr.
San Francisco CA 94112
Response to Comment Letter 5

Response to Comment 5-1. Comment noted.

Response to Comment 5-2. Please see Master Response 3, Need for Conference Center for information as to why a conference center is needed on campus. This response also indicates that the conference center and guest accommodations have been substantially scaled back in size. Please also see Chapter 2, Project Refinements, for additional details.

Response to Comment 5-3. The Draft EIR provides an evaluation of traffic, parking, and police issues in accordance with CEQA and the CEQA Guidelines. Please see Draft EIR Section 4.11, Traffic, Circulation, and Parking, and Section 4.12, Utilities and Public Services. Please also see Master Response 15, Transportation Impacts and Master Response 1, Response to Neighborhood Issues.

Response to Comment 5-4. As a state institution, the University is not permitted to use state funds, such as those associated with construction of new academic buildings, to help finance the capital costs of parking facilities. This means that increased parking fees will need to be used to fund new and replacement parking facilities. Beyond its legal requirements, SF State prefers to use its limited discretionary funding to subsidize the education and housing of its most needy students, rather than subsidize parking for all students. Removing parking subsidies is also supported by the San Francisco General Plan and Transit First Policy. Please refer to Master Response 15, Transportation Impacts, for further information.

Response to Comment 5-5. Draft EIR Table 3-1 (page 3-8) indicates that about 26,596 total students, also known as headcount, were enrolled at the main SF State campus in Fall 2006. As indicated on Draft EIR page 3-8 the increase in total students, or student headcount, is used as the basis for the EIR, as it accounts for the total number of students enrolled on the campus.

Response to Comment 5-6. Chapter 5, Alternatives, did evaluate off-campus alternatives (see page 5-5), including: (1) expansion of SF State regional centers, such as the Downtown Center; and (2) location of a new satellite campus on another site. Both of these alternatives were considered but rejected as infeasible. As indicated in the Draft EIR, SF State is primarily an undergraduate institution where the critical mass of students and faculty and diversity of course options are what make for a rich education. Moving some of the educational programs and faculty to SF State regional centers would not support the educational mission of the SF State campus. Moreover, the SF State regional centers do not have adequate capacity to accommodate the proposed enrollment ceiling increase and physical development anticipated by the Campus Master Plan. Additionally, as the SF State campus does not own any other land that would be suitable for a new satellite campus, such an alternative is also not considered feasible. It should also be noted that it is much more sustainable and environmentally sound to expand an existing urban campus where the infrastructure is already in place versus developing a new campus on
undeveloped land remote from these resources. For the above reasons, off-campus alternatives were not evaluated in detail in the Draft EIR.

**Response to Comment 5-7.** Please see Response to Comment 5-3.
Montessori Children’s Center
80 JUAN BAUTISTA CIRCLE – SAN FRANCISCO, CA 94132 – (415) 333-4410

Judith Flynn
Montessori Children’s Center
80 Juan Bautista Circle
San Francisco, CA 94132

March 28, 2007

ATTN: RICHARD MACIAS, CAMPUS PLANNER
OFFICE OF CAPITAL PLANNING, DESIGN & CONSTRUCTION
SAN FRANCISCO STATE UNIVERSITY
1600 HOLLOWAY AVENUE
SAN FRANCISCO, CA 94132-4021

Dear Mr. Macias,

This is a letter to raise concerns about the Environmental Impact Report for San Francisco State University’s Master plan. Specifically, it is intended to address the following points and request further study of these areas:

- Lack of necessary parking
- Increased traffic
- Loss of family/senior friendly residential community
- Lack of infrastructure to support the above

Parking: As the Director of a small Montessori preschool located in the Parkmerced community, parking is already a serious problem for the Center at drop-off and pick-up times and for any special events. No matter how intense the desire of the expansion team is for current and future students to use alternate forms of transportation, the automobile is still going to be first choice for most, resulting in an increase in the number of cars on the streets in all the adjacent areas, an increase in air pollution and noise, and a complete disregard for parking regulations, including those regarding the Center’s small lot. It is unclear to me why the expansion plan has concluded parking is not a problem when it clearly is. I believe there must be additional parking facilities included in the plan.

Traffic: Traffic in Parkmerced and around the area has consistently increased over the past 10 years, making access to highly traveled streets like 19th Avenue and Lake Merced Boulevard extremely difficult at peak travel and student class time – it is not unusual to wait ten to fifteen minutes to enter Lake Merced
Boulevard from 6:50 - 7:00 pm. Further congestion in the area will lead to serious problems.

There is no doubt in my mind based upon what I see daily that the increase in the number of cars will adversely impact the safety of the residents of the area, and also the children of the Center. As an example of this, at our specific location at Juan Bautista Circle, there are no crosswalks. This jeopardizes the safety of individuals attempting to cross the street to the park, and any increase in traffic will only add to this danger.

**Loss of community:** Parkmerced has long been a haven for families and seniors. With the high cost of housing in San Francisco, it offered affordable housing, green space for children to play and a quiet, non-urban atmosphere. For seniors it offered the same benefits. With the further expansion of SFSU into Parkmerced, the creation of a hotel/conference center, and the transformation of Holloway into a retail center, the proposed changes will have the effect of transforming a family friendly area of San Francisco into a student-oriented one. As areas which are friendly to families have been rapidly disappearing in the city, this should be a major concern. Many political advocacy groups, local political leaders, social activists, and educators have all taken up this cause, because San Francisco cannot afford to lose its families and children if it wishes to maintain its vibrancy as a city. The SFSU expansion threatens one of the few remaining family-oriented areas in the city, and further discussion should take place regarding how Parkmerced can maintain this role if SFSU expands.

**Infrastructure:** An increase in students will also affect the infrastructure in the area. Additional city services such as transportation, utilities, police presence, and road maintenance will all be required. It is amazing to me that these services were not identified or mentioned as a need of the SFSU expansion, and also that the city has not begun planning for these additional infrastructure requirements prior to the implementation of the plan.

These are a few of the areas which I think were absent from the EIR. There are many other issues related to the expansion of SFSU which deserve careful and measured consideration before this expansion plan begins.

Thank you.

Sincerely,

Judith Flynn
Director
Montessori Children's Center

cc: Supervisor Sean Elsbeth
Response to Comment Letter 6

Response to Comment 6-1. Please see Master Response 15, *Transportation Impacts*, which discusses parking issues raised during the public review of the Draft EIR. Additionally, the Montessori Center may have SF State commuters towed from its private lot, and may work with the City to create or expand curbside passenger loading areas to serve it.

Response to Comment 6-2. Please refer to Master Response 15, *Transportation Impacts*, which indicates that automobile trips to the campus will likely not increase with growth and development under the Campus Master Plan, which includes the implementation of a full range of measures to minimize automobile use and maximize alternative modes of travel. Draft EIR Mitigation TRA-1 would be implemented to monitor peak hour vehicle trips associated with the campus and if trips increase, additional Transportation Demand Management (TDM) measures will be implemented. If such measures are not successful, two intersection improvements along Lake Merced Boulevard may need to be implemented to improve conditions.

Based on the level of service analysis conducted for the Draft EIR and updated as part of the Final EIR, the maximum westbound approach delay at the intersection of Lake Merced Boulevard and Font Boulevard is approximately 2.5 minutes/vehicle under existing conditions. Under the worst-case analysis where campus-related trips do increase (see Scenario 2, page 4.11-27), the approach delay is projected to be approximately 4.3 minutes/vehicle in 2020 without the project and approximately 6.3 minutes/vehicle in 2020 with the project. With the mitigation measures proposed in the Draft EIR, the projected delay in 2020 with the project is projected to be approximately 36 seconds/vehicle, which is less than the approach delay under existing conditions. The mitigation measure proposed in the Draft EIR is projected to improve the LOS at the intersection and reduce approach delay compared to existing conditions.

Response to Comment 6-3. This comment raises a concern that University expansion into Parkmerced would disrupt the family-oriented sense of community that currently exists there. The Campus Master Plan does envision neighborhood-serving retail along Holloway Avenue, and a conference center on Buckingham, as the commenter notes. However, all proposed development within the Campus Master Plan would occur within the campus’ current footprint; no expansion into Parkmerced is envisioned as a part of this plan.

The proposed retail is intended to serve both neighbors and the campus community—faculty and staff, as well as students—with shops and services located in easy walking distance. In addition, with improved pedestrian and bicycle connections between the campus and neighborhoods, the campus open space and recreation fields will become more accessible as a community resource.

The final Campus Master Plan includes several significant programmatic changes since the draft was released to the community. First, the net increase in new on-campus student, faculty, and staff housing has been almost doubled and will accommodate more students in supervised, on-campus housing units. By creating more on-campus student housing, students who may have otherwise chosen to live within Parkmerced will be more likely to find accommodations on campus. Second, the proposed conference
center / hotel, which was to have included 250 hotel rooms, has been substantially scaled-back in size. Although the exact mix of guest rooms and University housing would be determined as a part of a detailed programming and design process, the center is envisioned as a flexible facility that could accommodate guests at conferences and other University-related activities such as prospective student/parent orientations, as well as providing some overflow housing for graduate students, permanent and visiting faculty, and staff. The new facility will contain a conference center of approximately 35,000 square feet with limited ground-floor retail and restaurant, along with a combination of guest rooms (approximately 80 rooms), and University suites and apartments (approximately 50 units with a mix of 1-, 2-, and 3-bedroom units), and a visitor center overlooking the valley for prospective students and families and other University guests.

These changes in the Campus Master Plan are directly responsive to concerns raised by several commenters. Please also see Chapter 2, *Project Refinements*, for additional information about the final Campus Master Plan.

**Response to Comment 6-4.** The Draft EIR does identify the potential need for improved infrastructure both on- and off-campus related to physical environmental impacts under CEQA. Please see Section 4.11, *Traffic, Circulation, and Parking* (Impact TRA-1) and Section 4.12, *Utilities and Public Services* (Impacts UTL-1, UTL-2, UTL-3, and UTL-4). Please also see Master Response 1, *Response to Neighborhood Issues*. 

Comment Letter 7

PRO
Parkmerced Residents' Organization
Tenant Association
P.O. Box 27609
San Francisco, CA 94127-6009
Voice Mail: 415-257-9661

February 14, 2007

Attn: Richard Macias & Simon Lam
Office Of Capital Planning, Design & Construction
San Francisco State University
1600 Holloway Avenue, San Francisco, CA 94132-4021

RE: Written Comments submitted in response to the SFSU (DRAFT EIR)

To Whom It May Concern:

The glossy non-factual evidence submitted by WRT and URS Corporation for the SFSU Draft EIR does not look at the cumulative impact/issues/facts based upon the overall development and prior impacts the SFSU expansion and enlargement has had on the communities surrounding the campus. It ignores basic premises of the CEQA in regards to looking at evidence in regards to its cumulative effects. It does not follow the requirements of CEQA in regards to section 21002.1 which notes to identify significant effects on the environment, identify alternatives to the project, and indicate manners in which those significant effects can be mitigated or avoided. It does not list or mention the environmental impacts, being the physical conditions which exist and are affected by the proposed project including land air, water, minerals, flora, fauna, noise, and objects of historic or aesthetic significance. Environmental impacts also ignored are also in regards to substantial adverse effects on human beings, either directly or indirectly—in this case the numerous “families” and “tenant’s” under rent controlled units that have been displaced.

No mention of any “special studies such as a full parking impact or a full housing impact or a full transportation study is noted.

No mention is made of any required re-zoning that would be required of established residential communities, as proposed, or effects on taller buildings proposed on surrounding communities such as a shadow study.

No note is made of the Biological Resources Study due to proximity and proposed connections to Lake Merced.

No mention is made of the Supplemental Information Form for Historical Resource Evaluation for Parkmerced as a historic District that should be preserved as a district.

It ignores the incremental cumulative effect and mitigation measures that must be reviewed based on section 15064(i)(3) which flows from CEQA section 21083. This project and its proposal cannot be gauged in a continuous vacuum! It must be looked at in regards to overall damage that occurs incrementally from a variety of small sources and their overall impact over the proposed 30 years of development pre and post this project. The impacts of the proposed density increases of buildings and population, the impacts generated by noise level, traffic and parking impacts, loss of rental housing stock due to SFSU purchases of University Park South (formerly portions of Parkmerced master-planned community an unprotected rental community landmark in itself) / University Park North blocks (a loss of approx. 959 rental units in the area), pollution and debris generated by the university and its population on neighborhoods + watershed areas of Lake Merced and the impacts on the municipal agencies such as Muni, DPT, Caltrain, BART, local areas such as West Portal, Ocean Avenue, Stonestown, Brotherhood Way, Parkmerced are not looked at significantly or cumulatively in this document.

Project Specific and Project Area Descriptions that are the basis of an actual report in declaring the negative issues are noted only in general terms in this report, and should be required as part of the analysis and reasons why a full EIR report should be required based on the cumulative long-term proposals as found on the Revised Environmental Evaluation Application August 14, 2006 from the City of S.F. Planning Department, which
is due to the CSU campus attempting in this document to avoid the issues which people are directing to their attention in the requirements for their mitigation, and requirements to lessen the impacts, and look at alternatives, where impacts to the Priority of the General Plan Policies of the City of San Francisco would make the CSU proposal mute if it were not a Cal State University project. California State Universities are given too much of a “carte-blanche” on developments and they have turned into greedy developers in the push to “expand” throughout the state.

I will remind you of the fact that SFSU has focused on greatly enlarging its population and density on and off campus in the surrounding community over 10 years since 1989 and its prior enrollment growth planning stages. If you had a group of 300-500 additional students moving next doors to your home I am sure the impact would be noticeable. This increase is way larger and over the last 6 years has negatively impacted all housing and rental units available, and all areas surrounding the university, and will further into the proposed future based on the proposed plans. The SFSU enrollment proposal far exceeds this, and for a small residential community such as Parkmerced that has seen families driven out in groups due to the constant influx, of students sharing units the effect has been disastrous. SFSU has developed new “recruiting” methods such as using “MySpace” online gimmicks to attract more students from out of state and internationally which has only impacted the housing crunch in the area for families and professionals working downtown and living in the area. SFSU sees increased enrollment as a cash cow, and has attempted to reach out internationally, to increase enrollment. Recently SFSU in their constant search for “soothing measures” have been addressing issues brought up by Parkmerced Tenants Organizations in an effort to address the constant complaints/issues through the SFSU surrounding neighborhoods. This taskforce chaired by Jason Porath who was only recently assigned to the issue due to the overwhelming neighborhood negative response to the lack of information provided originally on the information provided to neighborhoods on the design intentions of the University in scope to the surrounding areas of the proposal and impacts of the SFSU development. Parkmerced Tenants groups such as P.R.O. have forwarded to Richard Corrigan President of SFSU for years with no response consistent letters and complaints to meet with SFSU on issues such as partying students, garbage and debris generated by the university with flyers, party notices, and move-in move-outs of students off campus, and its affiliations throughout the neighborhoods, control of students off campus through section 5 of the housing and university judicial requirements, speed and reckless driving, lack of parking, and lack of developed housing on campus for students within original SFSU boundaries.

Briefly I looked through the section “Planning Context” of the SFSU document and noted the sentence “MUNI’s M line provides light rail service directly between SF State and downtown SF, the location of the University’s Downtown Center.” No comments are raised on the impact on the MUNI system, no comments that the trains are oversubscribed, delayed, and poorly maintained, based on overuse by students attempting to reach SFSU campus daily. The M line route is frequently delayed and dangerous situations occur daily when hordes of students pour onto the platforms and congest and push out onto 19th Avenue. The system currently cannot hold the number of students attending day and night classes. The M-line is not a service that is jointly paid for by SFSU and the City of S.F., SFSU does not contribute financially to the improvements of the transportation systems that service their campus, and this causes a logistical nightmare in terms of traffic and lack of parking in all surrounding neighborhoods. When I see students circling over half the blocks on Parkmerced property for a spot on any given day and night when campus is in session, and students actually sleep in their cars in the morning eating fast-food, and throwing garbage out their windows while they circle the blocks for parking. Any notion that eliminating any campus parking buildings and “blending” this in to the surrounding areas is a joke.

Transportation improvements should be a mandatory mitigation measure as an initial improvement prior to any proposed “growth” in population.

The housing impacts are similar as an issue with the purchases of UPS and UPN by the SFSU Foundation. The lack of housing on campus, has made the SFSU foundation look at other ways to “satiate” their needs for housing and re-sellable/rental space “growth”, to be more financially profitable, without providing for it financially but gaining by having their “mafia-like” branch the SFSU Foundation take the role or “developer” and purchase nearby rental housing stock converting it to “dormitories” and taking away the “tax-base” of these units from the city. The Parkmerced area purchased was through a “side-deal” with Bert Polacci who now works for Alliance Realty in managing those purchased properties for the SFSU Foundation as part of a previously self termed “strategic alliance” noted by Richard Corrigan. This “Executive Director” sold off portions of a masterplanned district of rental garden apartments, to
SFSU for the "landscape improvements" that ended up dying off and being poorly maintained by future gardening staff on the Parkmerced property. The $2.5 million received noted for the rental building improvements and landscape improvements were not used to upgrade the building. The safety or maintainance issues that tenants would have needed and instead all items were deferred until the recent sale of Parkmerced, no party or city organization contested this sale, and the current plans for one particular block reduce the "use" features of the community where they plan the "creative arts facility". The impact on the initial plan was reduced by the WRT planners, to make it look less significant but this does not fool a trained eye. The impact is reduced but not eliminated, and as the project is phased, they can and probably will request rezoning and attempt to open the area further to higher density. Holloway Avenue is a buffer zone to the Universities Growth; it was designed as such and should remain as such. No growth or development of property should occur south of Holloway Avenue regardless of the intent of "use" or ownership of this property. The current zoning shows it as residential with a major side arterial separating it from the campus for a distinct reason that the residential and densification proposals being pushed by the university should remain separate. The UPN parcel was immediately attacked by SFSU for "reconstruction" and tenants were noted and requested to move out to allow for the retrofit work. Alliance property managers for Parkmerced have embarked with the new owner on "renovations" and "improvements" that are highly "ornamental in nature" and excessive in changing the quiet character of the district. The proposals for the "Telegraph" avenue of Holloway Avenue would only add to the negative impact on the surrounding housing and development known as Parkmerced.

The SFSU document notes that "the charge of the masterplan is to provide the physical infrastructure and the most efficient sequencing of new construction to support an additional 4,000 PTE's as well as define the capacity of the campus growth for the future." How does the university contribute currently to the City and the infrastructural needs of the district? None are discussed in depth in this document. The definition they provide is not similar to UC Berkeley, and UC Santa Cruz where expansion planning and "SPRAWL" dictates the profligacy the occurs behind the veil of the campus "Foundations" that corporations back. With all the advertisement and showcasing of the SFSU downtown campus, why is it that no mention of mitigation measures, and development downtown instead as a proposal for an "urban campus" is not even explored or mentioned? Where is the development downtown of housing needed for SFSU business school facilities? There is numerous lower housing developments downtown so why cannot the university be made to mitigate the impact by developing their expansion plans downtown? Provide more housing stock, improve the transportation and major infrastructural needs prior to any expansion.

The universities stated strategic plan is to "model on campus the world in which we would like to live." They show in this document pictures of "multiculturalism, green technologies" and emphasize the constraints physically on their campus. They note that it was between 1989 and 2005 a predominantly commuter campus that is transformed to a more residential one. But at what cost? It already had "residents" and tenants nearby that due to the impacts of the university left in droves creating a more "transient populace on the Parkmerced property. The impacts are glossed over by the carefully selected and notated images. The strategic plan ignores the needs over other San Francisco citizens' have needs no impact is noted for the loss of Lot 41 which is a Parkmerced portion of the original master-planned community as a recreational area. The SOTA site was a school site, and the loss of families means fewer children for a possible new school that was a part of the original masterplan of Parkmerced! They impose their philosophy and decisions on an established community as they noted they have placed signs pointing to parking on Parkmerced property, they located originally in concept large blocks on Parkmerced sites in UPS and proposed four story residential over retail for a "college avenue" down Holloway, ruining a neighborhood over the last 10 years by not building sufficient student housing, and than as a final nasty act they purchase neighborhoods surrounding and don't control the impacts of these students as they push out families and professionals. They ignored the "design and masterplan" of the original developers of Parkmerced. They are ignoring the "landmark" possibilities of this area as a district over 50 years old. One of only 4 masterplanned garden rental communities in the United States! No information was made regarding the offers of "buy-outs" being offered to SFSU owned UPS to quicken their development plans. The claim that the campus will be more "vibrant and self-sufficient" emphasizes the "ME-ME-ME" notion of SFSU and the lack of understanding the campus has with its neighbors. Resources already exist at West Portal, Ocean Avenue and Stonestown. Shopping facilities and "mall avenues" already exist over @ Westlake Shopping mall. The maps showing the "evolution of
Comment Letter 7

Page four Macias letter

campus" ignore the "evolution of the surrounding neighborhoods. Parkmerced is "cut-off" on all drawings and the analysis boards, only draw lines connecting and showing circulation patterns refusing to look at the actual "impact zones" of pedestrian and auto traffic impacts. No analysis is done on the Parkmerced property and the increase in transient tenancies due to the larger impact of students on the area. No mention is made on the impacts on families living in UPN and UPS.

The Lake Merced section discusses the "forbidable barrier of Lake Merced Boulevard" they don't even state that it's a good reason to keep mountain-bikes, skateboards, and partying students and their garbage from the watershed areas or the "family" communities that exist surrounding the campus. They do not note the impacts of the Village at Centennial Square or the Corporation Yards in terms of the cumulative effects on the overall development and long term effects of all the connections and density impacts on this natural feature. The only reason the campus looks somewhat manicured is the landscape budget of the university. Look at Parkmerced and you can see what students impacts are typically on a community. I would not wish this to be the impact that will occur to Lake Merced.

I enclose a recent article on the report of UC Santa Cruz and the battle that the organization "C.L.U.E." has had with this institution as a similar issue seen here in San Francisco @ SFSU. I also attached a letter from DOCOMOMO attesting to the Architectural, Historical, and Landscape Features that made the Parkmerced neighborhood and "district" in San Francisco what it is today. I urgently ask that you bring this "masterplan" and its Draft EIR, and push that the Cal State University system similar to the UC system be given the red light on their overall "masterplanning and developmental profiteering" until reasonable controls, and rules are put in place that protect the areas from the gloved over "draft EIR that SFSU has proposed as addressing the concerns of the area.

In my most humblest of opinions as a designer and architect who regards architecture as a "civil-service" and civic duty in regards to housing and the development of "livable cities" I urge you to reject the draft EIR on grounds that it is incomplete, and non-responsive to the cumulative effects on the area.

If you don't state that SFSU's masterplan is "sprawl" and demand densification and actual urban development downtown, than the EIR process is meaningless in controlling growth and sprawl. Families are forced every further outwards to the suburbs in search of "affordable" housing but this just is sprawl compounded and nothing is being developed at the CSU and University levels that helps to bring the "education" component of the equation in line with the local and general plan outlines that the City of San Francisco states as their mission.

I urge all of you to re-read the section on Appendix G of CEQA especially in regards to items a-z with emphasis on the noted items below:

2) Have a substantial demonstrable negative aesthetic effect (student garbage/litter, graffiti)
3) Induce substantial growth or concentration of population (SFSU is busy trying to increase pop.)
4) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (already a nightmare in the area)
5) Displace a large number of people (already has occurred due to purchase of UPN/UPS)
6) Increase substantially the ambient noise levels for adjoining areas (Parkmerced)
7) Disrupt or divide the physical arrangement of an established community (Parkmerced)
8) Conflict with established recreational, educational, religious or scientific uses of the area (Parkmerced and Lake Merced)

It is time that the politicians step in and protect the requirements of the law developed by individual cities that are known as the "general plan" of the City of San Francisco, and the statutes of CEQA in relation to the SFSU's attempt to overrun these laws. The SF planning dept. is avoiding the issue based on the statutes that allow the California University System and the UC System to flaunt there investment, and research dollars at the expense of proper controls of urban development. These laws are meant to protect the housing stock and renter's situation in all cities and only in recent years has the greed of developers shown across the nation that the requirements for rental housing and affordable housing in cities is being depleted, and not replaced in a timely fashion. This crisis is as real as global warming. This crisis tends to push the lower and middle income classes out of the high-priced urban centers, into the desolate sprawl that has consumed the state of California to the detriment of the previously protected natural and physical attributes such as Parkmerced that would have been protected and
preserved prior from such expansion plans through CEQA, and prevented such an end-run around the established system. I urge you as individuals to look carefully at this proposal and to take action based on placing Parkmerced immediately on the Landmarks Register as a Historic District, to protect it as an icon of proper well designed urban development and support in any way possible the financial and legal assistance required to do so. I hope you reject the Draft EIR, and Final EIR as an irresponsible ploy by the University to take into account the actual impacts they will cause. And I hope you will install new legislation that addresses the "bully-developer" systems that are our Educational Universities of this state to control and make them accountable for the growth and impacts they incur on surrounding communities, financially, legally, and with all due haste.

Sincerely,

Aaron B. Goodman,
Vice President, Parkmerced Residents Organization
Cc: PRO® (Parkmerced Residents Organization)
   S.F. Board of Supervisors (all supervisors)
   Mayor Gavin Newsom
   S.F. Planning Dept.
   S.F. Landmarks Dept.
   S.F. MUNI
   State of California District Representatives
   State Senators
   SFSU Foundation
Report criticizes UC’s expansion planning

By Rick DelVecchio
Chronicle Staff Writer

A state legislative analyst’s report released Thursday found that the university has an obligation to negotiate fair-share payments with local public agencies, legislators were concerned when they heard of the finding at a briefing Thursday, Assemblywoman Lore Hancock, D-Berkeley, said.

"I think that this has really opened the eyes of many legislators," she said. "I think there’s going to be a real interest in having some follow-up hearings to see if there aren’t some ways we can work together better."

Among the report’s findings was one that said UC campuses should expand their summer sessions to avoid having to build new classrooms to accommodate enrollment growth.

Campuses have much unused capacity in the summer and should make better use of it, instead of taking on the expense and environmental impact of new buildings, according to the report.

"Campuses should view the summer term as an opportunity to offer courses that typically fill up quickly during the other academic terms," the report said.

Summer students as a percentage of full enrollies range from 13 percent at UC Berkeley to 31 percent at UC Santa Barbara.

UC will respond to the report after studying it, spokeswoman Jennifer Ward said.

Email Rick DelVecchio at rdelvecchio@sfchronicle.com.
December 16, 2005

Elizabeth Hill
Legislative Analyst
5 L Street, Suite 1000
Sacramento, CA 95814

tear Ms. Hill,

I am writing to respectfully request your office to review and report on the University of California’s (UC) ongoing Range Development Planning process and evaluate whether it adequately addresses the impacts thatampus growth has on its surrounding communities. However, I would like to first thank you and your staff for the insight and assistance you have provided me with this issue. This request is the culmination of work that resulted in AB 1690, which was vetoed. AB 1690 was an effort to address what has become a costly and contentious issue between local governments and the UC.

As you are aware, this is an issue with which I am intimately familiar. I was the first UC Santa Cruz (UCSC) alumnus to serve as a Santa Cruz City councilmember and mayor. When I was a member of the council in 1988, the city sued UCSC over its Long Range Development Plan. The city and the campus’ surrounding communities felt strongly that UCSC was not appropriately addressing the impact of its growth. As a proud UC alumnus and former officer of the UCSC Alumni Association, it was uncomfortable to be a part of this suit. Since then, I have long desired to address this structural problem between UC and the cities and counties in which campuses are located. It is my hope that this report will help initiate a process whereby we may address this issue.

Regarding the study’s specifics, to the extent feasible I would like it to consist of the following criteria:

1) An assessment of the fiscal impacts that UC campus expansion present to their surrounding communities, and whether surrounding local agencies are adequately compensated for those impacts.

2) A review of the planning processes used by UC to prepare long range development plans for its campuses, including the extent to which UC’s LRDP process incorporates local and community input.

3) Discussion of possible improvements to those processes. This should include a review of the policies adopted by other states to mitigate local impacts of university campuses, and the identification of any models for implementation in California.

I would like the report to be submitted to the Legislature no later than December 1, 2006.

I recognize this request will require considerable review and resources within the timeframe requested and appreciate your willingness to work with me in the development of this study.

Thank you for your consideration of this request. Should you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

John Laird
Comment Letter 7

From: AWOLFRAM
Subject: SFSF Master Plan EIR
Date: January 16, 2007 9:20:42 AM PST
To: info@SFSUmasterplan.org

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

Re: SFSU Master Plan / Negative effects on Park Merced

Dear Mr. Mercia,

Docomomo is an international organization dedicated to the preservation and documentation 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 SPUR, over the last eight years. We consider Park Merced to have a high degree of architectural and historic significance, as well as a high level of integrity.

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 of 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 SFSU Master Plan has an extremely negative impact on the historic fabric of Park Merced by the demolition of many urban blocks that include significant historic buildings and landscape. Docomomo NoCa recommends that the existing buildings and landscape in the Park Merced blocks that have been purchased by SFSU should be retained in their existing configurations.

Sincerely,
Andrew Wolfram
Hi Aaron,

I just wanted to touch base with you regarding the Board of Supervisors' Land Use legislation that will impact the time limits for landmark designations. Those time limits won't go into effect -- ie, the official clock will not start ticking -- until the landmark designation is actually initiated. At this point, Parkmerced is on the Landmarks Preservation Advisory Board's work program, which means that they have asked staff to look into the property, to investigate its eligibility for the local, state, and national registers. Once that background research is complete, the Board of Supervisors, or the Arts Commission, or the Planning Commission will actually initiate the designation process, and at that point the time limits will come into play.

I hope that this helps,

Sophie

Sophie Middlebrook
Preservation Planner
1660 Mission Street, Suite 500
San Francisco, CA 94103
(415) 558-6372 ph
(415) 558-6409 fax

Aaron Goodman
<aarong@parkmercedresidents.org>

To

01/04/2007 08:29

CC

PM

hs.comminh@yahoo.com

sophie Middlebrook
<Sophie.Middlebrook@sfgov.org>,
Delvin Washington
<Delvin.Washington@sfgov.org>,
Steve Wertheim
<Steve.Wertheim@sfgov.org>

Subject

Appeals

Parkmerced Board of Permit Appeals
Response to Comment Letter 7

Response to Comment 7-1. The Draft EIR does provide a program-level evaluation of all topics required by CEQA and the CEQA Guidelines. The scope of the environmental impact analysis provided in the Draft EIR is summarized on page 4-1 and includes aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, transportation and parking, utilities and public services, agricultural resources, and mineral resources.

Cumulative impacts for each environmental issue are addressed at the end of each topical section (see Sections 4.1, Aesthetics through 4.13, Other Environmental Resources). The basis for the cumulative impact analysis is described in Chapter 4, Introduction (Draft EIR pages 4-3 and 4-4) and has been prepared in accordance with CEQA and the CEQA Guidelines. Where significant environmental impacts have been identified, the Draft EIR identifies mitigation measures. Additionally, a reasonable range of alternatives is addressed in Chapter 5, Alternatives. Please also see Master Response 9, Program vs. Project-Level EIR Analysis and Master Response 11, Baseline for Environmental Analysis for additional information.

Response to Comment 7-2. Please see Response to Comment 7-1 above. Additionally, the issue of displacement under the CEQA standards of significance is evaluated in Draft EIR Impact POP-3 and Impact POP-4 (pages 4.10-14 through 4.10-16). Please also see Master Response 14, Regional Housing Supply Impacts, which further discusses displacement of existing tenants in UPS and UPN.

Response to Comment 7-3. Please see Response to Comment 2E-2.

Response to Comment 7-4. As the SF State campus is located on state land it is not subject to municipal regulations, such as the San Francisco Zoning Code, and therefore rezoning is not required for development on the UPS and UPN portion of the property to proceed. As indicated in Impact LU-2 (Draft EIR pages 4.8-7), while it is expected that during the next Planning Code update process, the City and County of San Francisco will re-zone these newly acquired properties for campus uses, this re-zoning is not necessary for the implementation of the proposed Campus Master Plan to proceed on lands owned by SF State. Further, the proposed Campus Master Plan for SF State generally conforms to relevant local land use plans. See Draft EIR pages 4.8-6 through 4.8-10 for additional information.

Additionally, as indicated on Draft EIR page 4.1-8, the San Francisco Planning Code Section 295 generally prohibits development above a height of 40 feet if it would cause significant new shadow on open space under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after sunrise and one hour before sunset, at any time of year. The proposed Campus Master Plan would not result in increased shadows on public open space areas under the jurisdiction of the San Francisco Recreation and Park Commission, as there are no such open spaces adjacent to the campus that could be affected by proposed campus development. Therefore, shadow studies were not performed as part of the preparation of the Draft EIR.
Response to Comment 7-5. 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.

Response to Comment 7-6. Please see Master Response 13, Parkmerced Historical Resource Impacts for a response to this comment.

Response to Comment 7-7. Please see Response to Comment 7-1. It should also be noted that where relevant, the analysis of cumulative impacts did include assessment of other pending and approved projects within the vicinity of the proposed project, based on a list provided by the City and County of San Francisco Planning Department. These projects are listed on Draft EIR Table 4.0-1 and shown in Figure 4.0-1.

Response to Comment 7-8. Please see Master Response 9, Program vs. Project-Level EIR Analysis and Master Response 8, Local Control Over Campus Land Uses.

Response to Comment 7-9. Please see Master Response 6, Proposed Enrollment Increase, which discusses the basis for the proposed enrollment increase.

Response to Comment 7-10. Please see Master Response 1, Response to Neighborhood Issues, for a response to this comment. Please also see Master Response 3, Need for More On-Campus Housing, which indicates why building more on-campus housing in the campus core is not considered viable.

Response to Comment 7-11. Please see Master Response 15, Transportation Impacts, for a discussion on transit and parking impacts of the project.

Response to Comment 7-12. As indicated in Master Response 3, Need for More On-Campus Housing, building additional housing within the campus core is not considered viable. Therefore, the University acquired the Stonestown apartments (UPN) and the northern blocks of Parkmerced (UPS) beginning in 2000 in order to expand its capacity to house faculty, staff, and students, and followed all pertinent CSU procedures in place at the time of the acquisitions. Please see Response to Comment 21-6, for a discussion of the connection between the campus and the adjacent Parkmerced area. Please also see Master Response 4, Village Main Streets.

Response to Comment 7-13. Draft EIR Chapter 5, Alternatives, does address the possibility of accommodating the proposed growth at SF State regional centers, such as the Downtown Center, Tiburon, etc. (see page 5-5). However, the Draft EIR concluded that moving some of the educational programs and faculty to SF State regional centers would not support the educational mission of the SF State campus. Moreover, the SF State regional centers do not have adequate capacity to accommodate the proposed enrollment ceiling increase and physical development anticipated by the Campus Master Plan. Therefore, accommodating proposed growth at regional centers was not evaluated in detail in this EIR.

Please see Response to Comment 21-9 regarding the location of the new Creative Arts complex on the site of the existing softball field at Lake Merced and Font Boulevards. Please also see Master Response 13, Parkmerced Historical Resource Impacts, Master Response 4, Village Main Streets, and Master Response 1, Response to Neighborhood Issues, for additional information.
Response to Comment 7-14. Comment noted. Please also see Master Response 12, *Biological Resource Impacts*.

Response to Comment 7-15. Comment noted. Please also see Master Response 13, *Parkmerced Historical Resource Impacts*.

Response to Comments 7-16 and 7-17. Please see Response to Comment 7-1 regarding cumulative impacts. Please see Response to Comment 7-12 regarding the potential for expansion at the Downtown Center. Please also see Master Response 14, *Regional Housing Supply Impacts*, regarding the potential displacement of residents in University Park South and University Park North.

The CEQA Guidelines standards from Appendix G listed in the comment have been replaced by the standards embodied in the Initial Study Checklist now contained in Appendix G. These newer standards are the basis for the impact discussion provided on a topic-by-topic basis in the EIR. The relevant standards are identified in each section of the document (see Chapter 4 of the Draft EIR). It should also be noted that the analysis provided in each topical section is based on current standards of CEQA practice and professional methodologies. Please refer to Chapter 4 of the Draft EIR for specific information about the approach for evaluating each environmental topic. Please also see responses to Letter 21 for specific responses to comments about each environmental topic.

Response to Comment 7-18. Please see Master Response 8, *Local Control of Campus Land Uses*. Please also see Master Response 14, *Regional Housing Supply Impacts*, regarding the potential displacement of residents in University Park South and University Park North.

Response to Comment 7-19. Please also see Master Response 13, *Parkmerced Historical Resource Impacts*.

Response to Comment 7-20. Comment noted.