

**4.1 INDEX TO COMMENTS**

As described in Chapter 1, all comments on the Draft EIR received either in writing or orally at the public hearings on the Draft EIR have been coded, and the codes assigned to each comment are indicated on the written communication and the public hearing transcripts that follow. All agencies, organizations and individuals who commented on the Draft EIR are listed below in Table 4-1.

**Table 4-1  
Index to Comments**

<b>Letter Number</b>	<b>Agency/Organization/Individual - Name</b>
	<b>State Agencies</b>
1	California Department of Transportation-Timothy C. Sable
	<b>Local Agencies</b>
2	City of San Francisco Planning Department-Dean Macris
	A. Supervisor Sean R. Elsbernd, District 7
	B. San Francisco Public Utilities Commission-Robert Hickman
	C. Municipal Transportation Agency-Peter Straus
	D. Municipal Transportation Agency-Jerry Robbins
	E. City and County of San Francisco Planning Department
	F. City and County of San Francisco Office of the City Attorney-Dennis J. Herrera
	<b>Organizations and Groups</b>
3	Docomomo US/Northern California Chapter-Andrew Wolfram
4	Golden Gate Audubon Society-Daniel P. Murphy
5	Lakeshore Acres Improvement Club-Chris S. Mamitsas
	<i>Merced Manor Property Owner's Association-Lynn Lynch (See Letter 47 Below)</i>
6	Montessori Children's Center-Judith Flynn
7	Parkmerced Residents' Organization-Aaron B. Goodman
8	Parkmerced Residents' Organization
9	Parkmerced Residents' Organization
10	San Francisco Housing Action Coalition-Tim Colen
11	Stellar Management-Seth Mallen
12	Summerhill Homes-Katia Kamangar
	<i>West of Twin Peaks Central Council-Denise LaPointe (See Letter 46 Below)</i>
	<b>Individuals</b>
13	Agee, Thomas & Pender, Robert
14	Bailey, Mabel E.

**Table 4-1  
Index to Comments**

Letter Number	Agency/Organization/Individual - Name
15	Bovill, Robert
16	Brown, Mary
17	Concolino, Christopher
18	Ellis, Linda
19	Faulkner, Terence
	<i>Gallaher, E.M. (See Letter 45 Below)</i>
20	Goodman, Aaron
21	Goodman, Aaron
22	Greenwell, Joey D.
23	Hastings, W. Woodland
24	Jiggetts, Ayan
25	Johns, Stephen
26	Johns, Stephen
27	Kitses, Anita
28	Lagos, Julian
29	Larsen, Arne
30	Le, Linh & Pham, Nhu
31	Leonard, George J.
32	Mcdermid, Harold
33	Mohan, Madan
34	Myggen, Daniel
35	Spriggs, Martha
36	Stovitz, Ronald W.
37	Torres, Adriana M.
38	Treachery
39	Venkatachari, M. K.
40	Venkatachari, M. K.
41	Voloshin, Beverly R.
42	White, Dustin (MTA)
43	Williams, Eddie
	<i>Wortz, Fujiko (See Letter 48 Below)</i>
44	York, Robert
45	Gallaher, E.M.
46	LaPointe, Denise
47	Lynch, Lynn
48	Wortz, Fujiko
49	Public Hearing #1
50	Public Hearing #2

## **4.2 MASTER RESPONSES**

### **4.2.1 Campus Master Plan Responses**

#### **Master Response 1. Response to Neighborhood Issues**

This master response addresses comments 2A-4, 7-9, 25-8, 25-9, 36-7, and others, which concern the University's response to neighborhood issues and call for a University-wide commitment to work cooperatively with its neighbors.

In May 2006, the University hired a full time administrator who focuses on community relations for the University. This staff person is charged with devising and implementing an external relations strategy for the University, including ongoing communications with community-based organizations and the City. This person also serves as a liaison between the University and external constituencies and works to identify new opportunities for SF State to partner with the community.

To facilitate collaboration and communication with its neighbors on issues surrounding student conduct and quality of life in the communities neighboring the campus, the University has established the Neighborhood Taskforce over the course of the past year. The University initiated the Taskforce because it cherishes its standing as a valued part of the community and is committed to being recognized as a good neighbor. The Taskforce is a partnership between the University's administration, faculty, and staff, its student leadership, its neighbors, and government officials and agencies. The Taskforce is an inclusive partnership, representing various points of view and constituencies. A broad range of perspectives is welcomed and membership is open to any interested student or community member. The Offices of Mayor Gavin Newsom, Supervisor Sean Elsbernd, and the San Francisco Police Department all actively participate on the Taskforce.

Over the course of this past year, the Taskforce has accomplished some early successes. University representatives meet regularly with neighbors and resident associations in Parkmerced and other neighboring communities, with Parkmerced management, City officials, and the police to coordinate responses to student conduct off campus. Additionally, due to a change in the State's Education Code, the University and its Police now enforce the CSU Code of Conduct both on and off campus. The CSU police patrol Parkmerced, and students creating disturbances or otherwise violating laws off campus (including, but not limited to, disruptive parties, underage consumption of alcohol, drug use) are subject to discipline on campus. Parkmerced residents have been encouraged to contact the University Police at any time should concerns arise regarding students—both on and off campus.

Additionally, the Taskforce has created an on-line course, "Welcome to the Neighborhood," which will educate students about the neighborhood, provide tips for being a good neighbor, and alert students to ramifications they may face for engaging in disruptive conduct off campus.

Please refer to Master Response 14, *Regional Housing Supply Impacts*, for response to concerns about the potential displacement of existing residents in UPN and UPS as a result of the Campus Master Plan. Please also see Master Response 15, *Transportation Impacts*, for responses to concerns about traffic and parking conditions surrounding the campus.

### **Master Response 2. Need for Conference Center**

This Master Response addresses Comments 2A-2, 2E-20, 5-2, and others. These comments question the scale and appropriateness of the Conference Center/Hotel as proposed in the draft Campus Master Plan (January 2007) and some recommend adding more housing to accommodate the increase in students, faculty, and staff.

In response to agency and public comments about the size and characteristics of the Conference Center/Hotel, the final Campus Master Plan (July 2007) proposes a significantly scaled-back University Conference Center with limited guest accommodations, plus housing for students, faculty, and staff in the same location as originally proposed. The final Campus Master Plan replaces the proposed 250-room, 250,000 gross square foot (gsf) hotel and 75,000 gsf conference center with a 150,000 gsf facility that includes 35,000 gsf of conference space, limited ground floor retail, 80 guest rooms, and 50 units of housing for SF State affiliates.

The revised University Conference Center would be reduced in height, from a maximum of 100-feet to a maximum of 70 feet. It would also occupy roughly half of the original footprint shown in the draft Campus Master Plan. In addition to incorporating 50 units of housing into the revised University Conference Center facility, itself, the final Campus Master Plan uses the area gained by reducing the footprint to locate an additional 140 units of new and replacement housing. See revised text and Figure 3-6 in Chapter 3, *Changes to the Draft EIR*.

The need for expanded conference space and accommodations on the SF State campus is apparent. Currently, the University has limited conference space—a total of 8,000 square feet in the Seven Hills Center and Towers—and limited on-site overnight accommodations at UPN during the academic year. As a result, SF State is unable to host events on campus to share the work of the University's departments, programs, and institutes or to provide accommodations to visiting faculty, speakers, prospective families, etc. The need for overnight accommodations and conference space to serve the University's varied programs was identified early in the master planning process. Central to the University's teaching and service mission is fostering the exchange of ideas within the academic and larger communities. A conference center provides such a forum and is a common component of university and college campuses throughout the country.

In addition, the University Conference Center would serve as a visitor center for prospective students and families and as a venue for campus and community meetings. It is conceived as a gateway to the University—a place of exchange between the campus and larger community—and, as such, is located on 19<sup>th</sup> Avenue, the University's most public face. Its proximity to Stonestown, the major commercial development in the district, is mutually advantageous. Its location on 19<sup>th</sup> Avenue takes advantage of

proximity to public transit. The conference center's reduced 70-foot height limit is lower than the heights of the adjacent campus buildings, Hensill and Thornton Halls, which are 117 and 149 feet respectively. Overall, the University Conference Center facility would be consistent with other existing SF State and Stonestown academic and commercial activities and would not result in land use compatibility issues with adjacent residential neighborhoods, as concluded in the Draft EIR (see Impact LU-2, pages 4.8-6 through 4.8-10).

### **Master Response 3. Need for More On-Campus Housing**

This Master Response addresses comments 2E-20, 2E-28, 10-2 and others. These comments recommend increasing campus housing beyond what is proposed in the draft Campus Master Plan (January 2007), replacing the proposed conference center/hotel with housing, and locating housing along 19<sup>th</sup> Avenue as an alternative to redeveloping housing sites in UPN and UPS. One of the comments also questions the parking ratio for redeveloped housing in UPN and UPS.

In response to these comments, the final Campus Master Plan (July 2007) adds more housing, raising the net increase in new housing to 657 new units, up from 340 new units proposed in the draft Campus Master Plan (see Chapter 2, *Project Refinements*, for additional detail). The final Campus Master Plan locates new housing on the existing Sutro Library site and on a number of sites within UPN and UPS. In addition, the final Campus Master Plan reduces the size of the University Conference Center proposed in the draft Campus Master Plan, incorporates 50 units of new housing into this revised smaller facility, and uses the area gained by reducing the University Conference Center footprint to construct additional housing. See revised Figure 3-6, Chapter 3, *Changes to the Draft EIR*. See Master Response 2, *Need for Conference Center*, above for additional detail about the reduced University Conference Center. Please also see Master Response 14, *Regional Housing Supply Impacts*, below for discussion of the project's impacts on the regional housing supply.

The alternative of locating housing within the campus core, especially along 19th Avenue, is not considered viable for several reasons. The sites along 19th Avenue are valuable academic sites that will be redeveloped at greater density than the existing 2-story buildings. Creating a compact and efficient academic core located within a 10-minute walking diameter—the distance that can be traveled in the time between classes—is of primary importance to fulfilling the University's academic mission. Accordingly, the Campus Master Plan reinforces the existing campus land use pattern by clustering housing outside the core and reserving land at the center of campus for academic uses.

With the exception of the proposed Creative Arts Building, the Campus Master Plan locates all future buildings on existing building sites or, in the case of Facilities (i.e., the Corporation Yard), on a surface parking lot, thereby increasing density without reducing valuable open space. The Campus Master Plan preserves significant open space—the Quad and valley, in particular—to provide needed recreational and social gathering space and to support a stormwater management system that retains and infiltrates stormwater on site, reducing demand on the City's storm drainage system and contributing to the health of the Lake Merced watershed.

**Master Response 4. Village Main Streets**

This Master Response addresses comments 2A-3, 2E-23, 21-6, 25-4, 26-8, and others, which concern the proposed campus “village main streets” along Holloway Avenue and Buckingham Way. Specifically, comments indicate that the development plans in the UPS area could detrimentally affect residents currently living there, and could have a deleterious effect on the area in the form of increased crime, pollution, congestion, noise, traffic, and accidents.

Both main streets are envisioned as mixed-use environments with limited ground-floor retail below housing or academic uses, or at the street level of the University Conference Center. The specific configuration of retail will depend on detailed retail analysis once projects come forward. Overall, the village main streets will provide needed neighborhood retail (a need expressed by many area residents), increase the housing stock, and will integrate the campus with the surrounding neighborhoods.

The intention of the Campus Master Plan is to provide neighborhood retail services within easy walking distance of the campus and the surrounding neighborhoods expressly to avoid unnecessary vehicle trips. Therefore, traffic and congestion are not expected to increase as a result of these uses and therefore they have not been included in the trip generation estimates for the Campus Master Plan. Further, while some changes to the roads themselves are contemplated (e.g. slightly narrower vehicle lanes), these changes are not expected to affect traffic and congestion, but rather to make the streets more pedestrian friendly. The University recognizes that the City and County of San Francisco has jurisdiction over the Holloway and Buckingham rights-of-way and will work with the City and related City agencies to advance plans for these two streets in the short and long term.

A program-level analysis of the environmental effects of these main streets is provided for in the Draft EIR, based on the details available in the Campus Master Plan. This analysis covers the issues of air pollution, noise, transportation and parking, housing, etc. However, it should also be noted that any proposed future development would be subject to a project-specific analysis under CEQA, which would ensure that environmental impacts have been fully addressed and mitigated.

Please see Master Response 14, *Regional Housing Supply Impacts*, for a discussion of concerns related to the potential displacement of existing residents in UPS and UPN. Please also see Master Response 1, *Response to Neighborhood Issues* for a discussion of security concerns.

**Master Response 5. Proposed Siting of Clinical Sciences Building**

This Master Response addresses comments 17-1, 18-1, 24-1, 24-3, 27-1, 31-1, 31-3, 31-4, 31-5, 31-6, 41-1, 43-1 and others, which concern the potential loss of sunlight to the west side of the Humanities building and the production of toxic mold due to the proposed siting of the future Clinical Sciences Building west of the Humanities Building.

The Campus Master Plan locates the future Clinical Sciences Building approximately 70 feet west of the existing Humanities Building on the current SOTA site. The building is sited here to: 1) avoid the existing 50-foot-wide sewer easement just west of the Humanities Building and 2) align with the existing

Village housing and Student Services buildings in order to create a consistent building edge that defines the future north-south pedestrian and bicycle corridor west of the Humanities Building.

Previous mold growth within the Humanities Building was associated with construction defects as described later in this response. Nevertheless, shadow studies were developed to demonstrate the extent of solar access to the west face of the Humanities Building, assuming a maximum of a 50-foot-tall Clinical Sciences Building to the west. Solar models were created in each of the two annual extremes—summer solstice, June 21; and winter solstice, December 21 (see Appendix C, *Clinical Sciences Building Shadow Studies*). The models illustrate the time at which a shadow cast by a new Clinical Sciences Building begins to strike the Humanities Building in both of these seasons—5:00 P.M. on June 21 and 3:00 P.M. on December 21. It should be noted that the Humanities Building itself blocks morning sun up until midday from its west facade; thereafter, the separation of the two buildings allows for extensive solar access in the afternoon hours. These studies also illustrate that the proposed 50-foot-tall Clinical Sciences Building would be lower in height than the existing Humanities Building. Therefore, views from the upper floor would be minimally affected.

It is commonly known that mold, or fungi, are ubiquitous in the natural environment. Similarly, mold spores are common within the built environment. In the built environment, where mechanical ventilation systems are present and properly functioning, mold spores are typically reduced when compared with similar genera observed in the natural environment.

Mold growth within the built environment, whether at SF State or any other locale, requires three principal elements: food, temperature, and moisture. As a natural decomposer, fungi will "grow" in most indoor environments and on most surfaces. Temperature, for the most part, acts as a growth regulator as opposed to a growth inhibitor. Moisture, however, is the primary contributor to growth within the built environment. Uncontrolled or excessive moisture is what permits the amplification of mold within the built environment.

Conditions that lead to mold amplification are, therefore, a function of the inability to remove moisture from the built environment. Moisture is introduced either by water intrusion, or component failure. Water intrusion can occur from numerous sources or events. For example, a construction defect in the design and/or installation of exterior building systems may lead to moisture condensation within an exterior wall assembly; improper design and/or installation of a vapor barrier system in the foundation may lead to long-term introduction of vapor into the indoor environment. Poor window installation techniques, improper flashing around roof vents, and so on, can permit moisture into the built environment. Unchecked, these conditions will supply sufficient available moisture to allow various mold genera to amplify. Unchecked building systems failures can result in the same phenomena. Mechanical and/or plumbing systems that fail can result in significant mold amplification problems. Typically, these systems are in voids or chases that are not easily accessed. Slow water leaks may go unchecked for a significant period, creating ideal conditions for mold growth.

Previous mold growth within the residential Towers and Humanities Building was associated with construction defects. Specifically, the Towers were affected by water intrusion through the external membrane. Moisture was retained in various building materials (ideal food source), which created an ideal environment for mold amplification.

In both instances, the causative factors were attributed to conditions not associated with normal operations. The day-to-day management of moisture within the built environment is controlled by mechanical systems and associated ventilation. One of the main purposes of building heating, ventilation, and air condition systems (HVAC), besides creating comfort for building occupants, is to control humidity, or the excessive build-up of moisture. The proposed Clinical Sciences Building will include an appropriately designed and maintained HVAC system. When designed for the site-specific conditions, operated and maintained properly, excessive humidity is eliminated. As a result, the chief component of mold amplification within the built environment is therefore eliminated as well.

### **Master Response 6. Proposed Enrollment Increase**

This Master Response addresses comments 25-3, 36-2, 44-1, and others, which concern the proposed increase in the SF State enrollment ceiling.

SF State is committed to preparing the future populations of the region and the state to contribute to the regional economy. Knowledge workers now form the bedrock of the California economy. As the population of California becomes more diverse, it is crucial that future generations receive the higher education needed to allow them to become part of the knowledge-based workforce. In fall 2006, 34 percent of all undergraduates were the first in their family to attend college. Among students who identified themselves as having Mexican American heritage, 83 percent were the first in their families to enter higher education. Higher education is the path to economic stability for young Californians. With SF State graduating nearly 8,000 students each year, it contributes to the foundation for economic growth for the state. In order to continue to provide this pathway to economic viability for all Californians, SF State must increase the number of young people who study, graduate, and enter the workforce.

Further, SF State is preparing good citizens. As indicated in the University's strategic vision, "San Francisco State University provides its students with an academic and personal experience that: Is both challenging and supportive; Is physically and programmatically accessible; Recognizes the variations in student circumstances and adapts the delivery of both academic programs and support services accordingly; Seamlessly integrates support services into the institution's academic fabric; Offers students a sense of campus community and opportunities for active involvement within it; Helps students gain a meaningful level of international understanding and global competence; Links the SFSU experience with the greater community through active civic engagement; Graduates women and men who are well-prepared in mind and spirit for positive citizenship and continues its relationship with them long after graduation through strong alumni ties." (San Francisco State University, University Strategic Plan 2005–2010)

The Campus Master Plan was developed in consultation with a broad range of academic and administrative representatives. The provost, the Academic Senate, and several faculty members participated actively, representing the academic and curricular concerns of the University. Care was taken to assure that the assumptions built into the Campus Master Plan were grounded in the academic mission of the campus and the long-range strategic plan envisioned by the campus. By necessity, enrollments drive facility needs. Analysis of future enrollment projections formed the foundation for the choices about space and facility needs included in the Campus Master Plan. Using recent enrollment trends along with state-wide demographic projections, the Campus Master Plan is a flexible blueprint to allow campus and community decision-makers to serve the anticipated population of future students.

Community colleges in California provide an excellent route for students to follow in completing the first two years of a college degree. The CSU campuses work closely with their local community colleges to align the curriculum in the first two years so that students who choose to start at community colleges arrive at the CSU campus fully prepared and ready to begin junior level classes. Not all students, however, choose to spend the first two years at a community college. Many prefer to become part of a four-year institution from their freshman year through graduation. Being involved with a single institution for the full period they are pursuing a bachelor's degree allows students to become more deeply connected to the faculty in their chosen major. The opportunities for meaningful research and community service in conjunction with the faculty are greatly enhanced when students are able to sustain enrollment at a single institution from the time they arrive on campus through graduation. Community colleges continue to provide an excellent pathway to a four-year degree for many students. But, as long as students are given a choice, many others will choose to enter a four-year institution for their college experience.

Student success in school and in life is the ultimate objective of the academic enterprise. For students to achieve this success, they must have access to the best faculty, course content and support services available. It is difficult to deliver knowledge and training for the 21st century, however, in facilities that are inadequate or inefficient. The University's first goal must always be to educate the students we serve. The Campus Master Plan for campus facilities allows campus leaders to create a physical infrastructure within which they can conscientiously manage the enrollment growth of SF State, while keeping the focus on preparing students to enter the workforce and contribute to the economic stability of California.

### **Master Response 7. Bicycle Parking/Lanes**

This master response addresses comments 16-1, 42-1 through 42-9, and others, which concern the need for more and conveniently located bike parking and storage, better and safer bicycle access, allowing for a higher bicycle speed limit within campus than proposed in the draft Campus Master Plan (January 2007), and coordination with the San Francisco Bicycle Plan.

The Campus Master Plan calls for all new buildings to have bike racks (specifically, inverted “U” racks) in visible locations near building entrances. The Campus Master Plan proposes three secure bike facilities / bike stations at convenient locations where bike routes enter campus—one along Holloway, one at the

corner of the new Science Building just south of the proposed Millennium Bridge crossing, and a third at the end of State Drive near the corner of the parking garage. See Draft EIR Figure 3-11, *Bicycle Routes and Storage* for these locations.

Holloway Avenue is maintained as an important bike corridor with dedicated bike lanes in each direction. On-street parking is seen as an important component of Holloway's pedestrian function allowing convenient, short-term parking close to ground-floor retail uses. The Campus Master Plan calls for improving enforcement of double-parking violations on Holloway from 19th Avenue to Font Boulevard. Enforcement would be a joint effort between the SF State Police who have authority within a one-mile radius of campus and the City of San Francisco.

Bike routes are designated on other campus corridors including the access around Cox Stadium, along Buckingham Way, between Humanities Building and the proposed Clinical Sciences Building, and along the eastern edge of the Quad. On-street bike lanes also are provided on Winston Drive and Font Boulevard. See Draft EIR Figure 3-11, *Bicycle Routes and Storage*, for these routes.

The 8-mph bicycle speed limit recommended in the draft Campus Master Plan (January 2007) was reevaluated in light of best practices at UC Davis, which is considered to be the best bicycle program in North America. The SF State bicycle speed limit is raised to 15 mph in the final Campus Master Plan (July 2007) consistent with the following UC Davis policy:

"Bicyclists must obey all posted speed limits. Additionally, no cyclist may travel at a speed greater than is reasonable and prudent under existing conditions. At the University, the speed limit in the campus core area and all other bike paths is 15 mph and in parking lots is 10 mph."

While the implementation of the plan will take place gradually over the course of the planning horizon until 2020, the University is already taking significant steps to encourage bicycling to campus. SF State representatives have been meeting with representatives from the San Francisco Bicycle Coalition and the MTA to identify locations for the placement of additional racks on campus. Discussions are ongoing. The Campus Master Plan calls for a north-south bicycle/pedestrian route from Buckingham Way to the campus core that would provide campus access to cyclists approaching campus from the north, while avoiding 19th Avenue. The University has submitted grant proposals seeking funding for such projects, and is considering other funding sources. The University is also in the process of forming a working group composed of on- and off-campus constituencies and agencies to guide its planning and implementation of bicycle amenities on and around campus. Additionally, with assistance from the Bicycle Coalition, the University has updated its website to provide more information on biking and walking to campus.

In the mid-term, the Campus Master Plan calls for construction of a pedestrian/bicycle bridge across the valley connecting University Park North and the campus core. Once complete, the north-south route from

Buckingham Way through campus to Cardenas Avenue would offer an alternative to the 19th Avenue route proposed in the San Francisco Bicycle Plan. This path would be open to the public at all times. In the long term, SF State will work with Caltrans and the MTA to explore a bike path along 19th Avenue as part of a larger street reconfiguration recommended in the Campus Master Plan.

## **4.2.2 Draft EIR Responses**

### **Master Response 8. Local Control Over Campus Land Uses**

This Master Response addresses comments 2E-1, 2E-13, 2E-14, 2F-3, and others. These comments raise questions about CSU's Lead Agency status over the project, whether San Francisco land use controls (e.g., local building and zoning ordinances) apply to the proposed semi-public uses on campus, and about how SF State plans to work with local jurisdictions on implementation of the Campus Master Plan.

As indicated in Draft EIR Chapter 1, *Introduction*, CSU is the Lead Agency under CEQA for the proposed Campus Master Plan. CSU is the Lead Agency as the SF State campus is one of 23 campuses within the CSU system and the Board of Trustees of the CSU system has the principal responsibility for approving this project.

As a university project on state property serving the university academic mission, SF State is sovereign and therefore exempt from municipal land use jurisdiction over campus development, and is not subject to municipal land use enactments, such as the *San Francisco General Plan* or the *San Francisco Planning Code*. Further, the land uses proposed in the Campus Master Plan will provide a range of services that will enhance the academic mission of the University, including internships, access to classroom and meeting room facilities, and employment opportunities for the students. For example, the University Conference Center, which has been reduced in size, will provide an on-site laboratory for the Hospitality Management Department within the College of Business. The University Conference Center will also provide the campus community with a venue for academic conferences and training facilities in order to serve various departments, centers, and institutes. Having a conference center on the campus will improve the ability of the University to host and attract major executive and academic conferences, which will strengthen many of the University's colleges, centers and institutes (see also Master Response 2, *Need for Conference Center*). Additionally, a small amount of neighborhood retail space will be provided within other new buildings (e.g., housing buildings) for those who live and work on and around the campus. The purpose of this retail is to serve the campus population such that unnecessary vehicle trips are avoided and to create a greater sense of a campus community (see Master Response 4, *Village Main Streets*). Further, the ground lease revenue generated by potential future retail would support the repayment of bonds and will provide financial support for the University.

While SF State is exempt, as noted above, from municipal jurisdiction over campus development, local planning polices are of importance to the SF State campus because the interface of campus development and local development are important to the community character. Moreover, SF State maintains cooperative relations with local governments regarding planning and land use issues to assure that mutual interests are addressed. For the purposes of coordination between SF State and the City and County of

San Francisco, the Draft EIR provides a review of the general conformance of the Campus Master Plan to the relevant portions of local land use plans and policies (see Chapter 4.8, *Land Use and Planning*). The focus of this analysis is to identify any potentially significant land use impacts that could occur adjacent to the campus on land under the jurisdiction of the City and County of San Francisco. The Draft EIR concluded that the Campus Master Plan for SF State generally conforms to relevant local land use plans (see Impact LU-2, Draft EIR pages 4.8-6 through 4.8-8).

Moreover, in conformance with its tradition of working cooperatively with the local community, SF State has in the past provided the City and County of San Francisco with a copy of its Campus Master Plan and related environmental documents as a courtesy. The campus will continue to do so in the future. Additionally, the University is engaged in discussions with the City regarding any anticipated off-campus impacts and will continue to do so in good faith in an effort to reach a mutually agreeable resolution on any points of contention. The University has been conducting its discussions with the City through the Mayor's Office, pursuant to the request of the City Attorney.

### **Master Response 9. Program vs. Project-Level EIR Analysis**

This Master Response addresses comments 2E-3, 2E-4, 2F-2, and others. A number of comments indicated that project-level analysis of some or all projects should have been performed in the Draft EIR and that the failure to do so is deferring the identification of impacts and mitigation to some future date. Comments further indicate that many of the impact areas, which are determined to be less than significant, should actually be potentially significant since they are evaluated absent project-level information and dependent on future mitigation.

The Campus Master Plan is a land use plan to guide the physical development of the campus. Adoption of the plan does not constitute a commitment to any specific projects, construction schedule, or funding priority. Further, the proposed Campus Master Plan does not provide site-specific design, engineering, and siting details. Rather, the proposed Campus Master Plan describes a program of potential development for the campus through 2020. Approval of the Campus Master Plan does not constitute approval of individual projects contemplated in the plan. As indicated in the Draft EIR (pages 1-3 and 1-4), subsequent to the proposed Campus Master Plan approval, each development proposal undertaken during the planning horizon of the plan will be subject to individual environmental review by CSU in compliance with CEQA, prior to project approval.

The Campus Master Plan EIR is a Program EIR that evaluates the effects of the maximum growth that could occur on the campus under the plan. A Program EIR is the appropriate environmental document for a series of actions that can be characterized as a single project, such as is the case for the development encompassed within the proposed Campus Master Plan. Further, according to the CEQA Guidelines Section 15168(b), the use of the program EIR provides for advantages in that it can: (1) provide for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action, (2) ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis, (3) avoid duplicative reconsideration of basic policy considerations, (4) allow the lead agency to consider alternative and programmatic mitigation measures early in the planning process, and (5) allow

for reduction in paperwork. While a Program EIR generally establishes a foundation for “tiered” project-level environmental documents that may be prepared subsequently in accordance with the overall program, it does not constitute a deferral of adequate environmental analysis under CEQA. Environmental impacts are evaluated to the extent possible and at an appropriate level of detail given the level of project information available in the proposed Campus Master Plan.

Additionally, appropriate programmatic mitigation measures have been developed that provide for performance standards to ensure that the mitigation will reduce the impacts to a less-than-significant level, where feasible. This conforms to CEQA Guidelines Section 15126.4(B), which indicates that the “formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.” Where it is unclear whether proposed mitigation will be implemented because the improvement would be located off-campus and therefore would not be under the control of the University, the impact has been determined to be significant and unavoidable.

For example, in Impact AES-3 (Draft EIR page 4.1-12), related to the potential degradation of the existing visual character of the adjacent Villas Parkmerced neighborhood, the impact from redevelopment of a portion of UPS is determined to be less than significant with the implementation of mitigation. Mitigation AES-3 calls for the development of architectural and urban design guidelines that would apply specifically to proposed redevelopment of several blocks in UPS. These guidelines would consider building color and design, exterior treatments and design detail, and building heights such that the proposed new development “is visually compatible with the adjacent Villas Parkmerced neighborhood.” As site-specific design details for development in UPS are not available, the impact was determined to be potentially significant to provide for a reasonable worst-case analysis. Implementation of proposed mitigation in accordance with the provided performance standard would result in a less than significant impact. Overall, it is reasonable to assume that this potentially significant impact is “mitigatable” given the proposed mitigation. Please see Chapter 3, *Changes to the Draft EIR*, for minor modifications to Mitigation AES-3. Please also see Master Response 13, *Parkmerced Historical Resource Impacts*, Master Response 15, *Transportation Impacts*, for additional examples of the Draft EIR programmatic approach to impacts and mitigation measures.

Furthermore, subsequent projects would be examined in light of the Program EIR to determine whether additional environmental documentation must be prepared. If, pursuant to CEQA Guidelines Section 15162, no new significant effects would result from the proposed project, all significant effects have been adequately addressed and no new mitigation measures would be required, then subsequent projects within the scope of the approved proposed Campus Master Plan may rely on the environmental analysis provided in the Program EIR and no additional environmental documentation would be required. In the instance where new significant effects would result, subsequent environmental documentation must be prepared.

**Master Response 10. Campus Population Growth Evaluated in the Draft EIR**

This Master Response addresses comments 1-1, 2E-16, 2E-21, 39-5, and others. Some of these comments ask whether the environmental analysis is based on the growth in full-time equivalent (FTE) students or on the growth in total number of students (also called student headcount or HC), or they question the basis for the net increase in number of students identified in the Draft EIR.

As indicated on Draft EIR page 3-8, the proposed enrollment target increase for the SF State campus is 5,000 FTE, an increase over the existing target of 20,000 FTE. SF State uses the student FTE for enrollment planning and for physical planning purposes. While this is the case, the total number of new students or HC, is used as the basis for the analysis in the EIR, as it accounts for the total number of students present on campus. Draft EIR includes mention of existing and future FTE only because the CSU system allows for enrollment ceiling increases based on FTE. Table 3-1 provides both FTE and HC for students (Draft EIR page 3-8). An increase in the enrollment target to 25,000 FTE would equate to about 5,517 total new students.

One comment indicates that as the ratio of existing FTE to existing headcount is 1.33, based on the information provided in Table 3-1 (Draft EIR page 3-8), the number of new students on campus should be about 6,650, not 5,517 provided in this table. Draft EIR Table 3-1 includes existing and future FTE only because the CSU system allows for enrollment ceiling increases based on FTE. As the proposed SF State Master Plan contemplates an enrollment ceiling increase from a target of 20,000 FTE to a target of 25,000 FTE, or a 5,000 FTE increase, this table uses 20,000 FTE, since that is the existing enrollment ceiling target for SF State. However, the existing on-campus FTE in Fall 2006 was 20,706, based on actual enrollment data (SF State 2006). This would result in a net increase of 4,294 FTE if and when the FTE enrollment ceiling increase to 25,000 FTE is approved. Therefore, the existing ratio of FTE to head count is about 1.285, not 1.33. When applied to the increase of 4,294 FTE, this ratio equates to approximately 5,517 new headcount students in 2020, which is the basis for the number of new students provided in Table 3-1. Table 3-1 has been revised to clarify that only existing on-campus student head count population, not FTE, is based on 2006 fall semester enrollment data for the main campus. See Chapter 3, *Changes to the Draft EIR* for details.

Another comment indicates that headcount for all of the various SF State population categories (e.g., students, faculty, etc.) should be increased by 25 percent given that FTE will increase from 20,000 FTE to 25,000 FTE, or a 25 percent increase. As indicated above, the estimate of 2020 student headcount population is based on the existing FTE (20,706) to on-campus headcount ratio (26,596), which is 1.285. When applied to the net increase of 4,294 FTE, this ratio equates to approximately 5,517 new headcount students in 2020, which is the basis for the number of new students provided in Table 3-1. Regarding other SF State population categories (e.g., faculty and staff), the increase in these categories is based on a straight-line projection based on the existing ratio of SF State students per faculty and per staff. These ratios are the basis for the number of new faculty and staff provided in Table 3-1.

It should also be noted that the population increases reported in Table 3-1 are based on straight-line projections based on the existing FTE to on-campus student headcount ratio, and other ratios. As the campus moves more towards a residential campus and away from a commuter-campus model, the gap between FTE and headcount will close. This is due to the fact that students attracted to a residential campus are more typically full-time students, rather than part-time students. Therefore, the net increase in total new headcount students provided in Table 3-1 is conservatively high, as it is based on the existing FTE to head count ratio.

### **Master Response 11. Baseline for Environmental Analysis**

This Master Response addresses comments 2A-4, 7-1, 21-2, 26-1, and others. These comments indicate that there are pre-existing impacts caused by SF State on the surrounding neighborhoods (e.g., noise and litter) that are not adequately addressed in the Draft EIR and that the baseline for discussion of new impacts should consider these pre-existing impacts.

As indicated on Draft EIR page 4-1, according to Section 15125 (Environmental Setting) of the CEQA Guidelines, an EIR must include a description of the existing physical environmental conditions in the vicinity of the project to provide the “baseline physical conditions” against which project-related changes can be compared. Normally, the baseline condition is the physical condition that exists when the Notice of Preparation (NOP) is published. The NOP for the proposed Campus Master Plan EIR was published on October 10, 2006. Therefore, 2006 is the baseline year for analysis in this EIR. Conditions existing in that year are considered to be the baseline against which changes that would result from the proposed Campus Master Plan are evaluated. Having said that, the University is actively addressing existing neighborhood issues as described in Master Response 1, *Response to Neighborhood Issues*.

### **Master Response 12. Biological Resource Impacts**

This master response addresses comments 4-1 through 4-49, and others. These comments raise a range of issues and concerns about the Draft EIR analysis related to biological resource impacts primarily in the Lake Merced area, but also on the campus.

#### *Campus Master Plan Components Related to Lake Merced*

The Campus Master Plan recommends a stormwater management system that provides for a new creek connection to Lake Merced via a new bridge overpass at Lake Merced Boulevard. This creek connection would return seasonal runoff to the lake, thereby contributing to raising lake water levels, improving water quality by creating movement in the volume of the lake, and enhancing recreational and habitat value. The plan also recommends that a pedestrian connection from the campus into the Lake Merced area be provided at this same location.

A number of comments raised concerns about the design and engineering of these various elements of the plan. In response to these questions, the final Campus Master Plan (July 2007) provides two additional figures (see page 65) related to the proposed pedestrian connection into Lake Merced. These figures illustrate the likely alignment of the pedestrian paths on either side of the creek and indicate that the paths would not extend to the lake’s edge. Rather, the paths would stop short of the edge of lake and associated

marsh vegetation. They would converge at an overlook and then would turn to the north where a single path would connect to an existing perimeter pedestrian trail. Therefore, the final Campus Master Plan clarifies that the paths would not be extended to the water's edge or into the lake's marsh vegetation. Further, bicycle access will not be allowed through this campus connection into Lake Merced. Pedestrian only barriers could be placed at the edge of the campus to prevent bicycle access through this campus connection into the Lake Merced area. These refinements serve to clarify the intent associated with the proposed pedestrian connection into the Lake Merced area from the campus.

Additionally, as all of the proposed improvements in the Lake Merced area would take place off-campus on lands not under the jurisdiction or authority of SF State, these improvements would require a subsequent planning, design, and approval process under the San Francisco Public Utilities Commission (SFPUC), the agency with jurisdiction over Lake Merced. Additionally, any subsequent approval process would include appropriate public involvement and input. It should also be noted that the approval of the Campus Master Plan by the CSU Board of Trustees does not authorize the campus or any other agency to proceed with the construction of identified improvements in the Lake Merced area. Only a subsequent approval process under the SFPUC will determine whether the proposed Campus Master Plan improvements in the Lake Merced area will in fact be implemented. Further, the identification of these improvements in the Campus Master Plan is not intended to supercede the Lake Merced Watershed Plan presently in development, or any other planning process.

The Draft EIR provides a program level analysis of the likely environmental effects of the recommended improvements, as stated on Draft EIR page 4.3-12, based on the conceptual design information provided in the Campus Master Plan. When these improvements are proposed in the future, the subsequent project-specific environmental analysis of these improvements would be based on more detailed siting, design and engineering information. As indicated in the final Campus Master Plan (July 2007), detailed design studies are planned for the creek corridor and for the Lake Merced Boulevard underpass/bridge (see Campus Master Plan page 121). Further, the mitigation measures proposed during such a subsequent process may reflect refined or modified approaches to mitigating impacts, based on the more detailed project-specific analysis of impacts that will be performed at that time and based on the regulatory permitting through the ACOE and/or RWQCB that would be required for the improvements. Having said that, some of the proposed Draft EIR impacts and mitigation measures related to Lake Merced and other biological resources impacts have been refined in response to comments, as further described below.

### *Erosion-Related Impacts*

A number of comments expressed concerns about erosion impacts in the Lake Merced area related to pedestrian access to the lake's edge and to floodwaters that could spill outside the new creek channel. As indicated above, pedestrian access to the lake's edge is not proposed in the final Campus Master Plan (July 2007). Rather, the paths would avoid the edge of lake and associated marsh vegetation and would connect to an existing perimeter pedestrian trail to the north. These paths would therefore avoid the steep sand banks adjacent to the lake's edge. Therefore, erosion due to pedestrian access would only occur due to any unauthorized off-trail use that could occur due to the presence of a new path connection. Revised Mitigation BIO-2C provides for appropriate signage and other design features (e.g., fencing) as deemed

appropriate by the SFPUC to keep people on the new path connection and to discourage the creation of ad-hoc trails. As noted above, bicycle access would not be allowed through this connection point. Please see revised Mitigations BIO-1A and BIO-2C, Chapter 3, *Changes to the Draft EIR*, which reflects the avoidance of the lake's edge and marsh vegetation.

Regarding the potential that floodwaters could discharge outside the new creek channel and cause erosion, it is important to note that the conceptual design for the creek provided in the Campus Master Plan assumes that the creek would accommodate a 100-year storm event. Furthermore, any creek connection under Lake Merced Boulevard and into the Lake would be designed and constructed in such a way as to stabilize the longitudinal creek profile and channel cross-section to accommodate anticipated flows through the creek. Design elements, such as riprap, check dams, and slope stabilization would be used to provide this stability. These provisions would all be studied in detail during the detailed design and engineering process that would be conducted when this project moves forward. Coordination of the creek connection design with any existing utilities that exist along the Lake Merced shoreline will also be part of the detailed design process. Please see new Mitigation BIO-1D, Chapter 3, *Changes to the Draft EIR*, which would ensure that flooding and erosion control are addressed as part of the design and engineering of the proposed creek connection and the Lake Merced Boulevard underpass/bridge.

### *Breeding-Bird Impacts*

According to the Golden Gate Audubon Society, a colony of 3 great blue heron nests was located on March 24, 2007 in the eucalyptus grove on the Mesa, which is directly west of the campus. These are the first documented nests in the area known as East Lake according to the comment and there is no evidence of nesting in previous years. According to the comment, it is unknown why the birds selected this site. However, apparently the Mesa colony is subject to much less disturbance than the other established South Lake and North Lake colonies.

The Draft EIR (page 4.3-7) does indicate that great blue herons are known to nest in "these eucalyptus groves." However, an editing error, which has been corrected, resulted in an incorrect reference to herons nesting previously in the Mesa, rather than in South Lake and North Lake. See Chapter 3, *Changes to the Draft EIR*, which corrects this error and also notes the recent observation noted above.

Comments were also raised about the accuracy of Table 4.3-1 in identifying the potential special-status species occurrences and habitat potential in Lake Merced. This table identifies special status species occurrences in the campus vicinity based on the California Natural Diversity Data Base (CNDDDB), the California Native Plant Society electronic database, and the official US Fish and Wildlife Service species list. See further information provided on Draft EIR pages 4.3-5 and 4.3-6.

The table only addresses the habitat potential and the potential for occurrence of special-status species on the SF State campus (see right-hand column of Table 4.3-1). As indicated on Draft EIR page 4.3-6, unless indicated otherwise, information about special-status or sensitive species occurrences in the Lake Merced Area is based on the Significant Natural Resource Areas Management Plan recently completed by the San Francisco Recreation and Parks Department in February 2006. This document assesses the current status of special-status and sensitive species occurrences and habitat potential in the Lake Merced Natural Area. See Chapter 3, *Changes to the Draft*, which clarifies this.

A number of comments expressed concerns about breeding bird impacts and mitigation measures. Comments concerned the nesting season for breeding birds and specific timing requirements related to construction. Please see revised Mitigation BIO-2A and new Mitigation BIO-2B, Chapter 3, *Changes to the Draft EIR*, which address these comments.

### *Annual Monitoring and Reporting*

The campus will be required under CEQA to produce an annual mitigation monitoring report, which will identify the campus's progress in implementing Campus Master Plan EIR and subsequent project-specific mitigation measures. Further, as required under revised Mitigations BIO-1B and 1C, restoration and replanting related to sensitive habitat and/or special-status plant species disturbance/removal in the Lake Merced area will take place in accordance with defined mitigation plans that specify location and extent of replanting/replacement and planting and management specifications (e.g., success criteria, monitoring, and reporting).

### **Master Response 13. Parkmerced Historical Resource Impacts**

This Master Response addresses comments 2-2 2E-10, 2E-12, 2E-28, 3-1 through 3-4, 7-6, 7-18, 13-2, and others, which concern the potential historic resource status of the former Parkmerced units located in University Park South and associated impacts of proposed redevelopment of these units contemplated by the Campus Master Plan.

The Campus Master Plan calls for the redevelopment of a portion of the area known as University Park South, which is along the northern edge of the Parkmerced development. It is acknowledged that the potential historic resource known as Parkmerced has been added to the Landmarks Preservation Advisory Board (LPAB) Work Program for 2007.

Draft EIR Section 4.4, *Cultural Resources*, provides a programmatic approach for addressing the full range of potential cultural and historic resource impacts that could result on campus with development contemplated by the Campus Master Plan. Related specifically to historic resources, the Draft EIR indicates that there are a number of campus buildings that will be 50 years or older by 2020 and that these buildings may qualify as historic resources as defined by CEQA. Table 4.4-1 provides an inventory of these buildings, which includes University Park South (Draft EIR page 4.4-6).

As indicated in Section 4.4.2.3 *Analytical Method*, buildings identified in Table 4.4-1 that are or would be at least 50 years of age during the planning horizon of the proposed Campus Master Plan are considered to be potentially eligible for listing on the California Register of Historic Resources (CRHR) and are considered historical resources for purposes of the impact analysis provided in the Draft EIR. Until definitive study determines that a resource lacks integrity or otherwise does not meet the criteria that define an historical resource, the resources so identified in Table 4.4-1 are assumed to be eligible for listing on the CRHR, and impacts to these resources are considered to be potentially significant in the Draft EIR, as identified in Impact CULT-2.

Impact CULT-2 indicates that the Campus Master Plan could cause a substantial adverse change in the significance of a historical building or structure. It should be noted that significant impacts to historic

resource may result from demolition or physical alteration of the buildings. Significant impacts may occur if the setting of a historic resource is altered by the introduction of incompatible elements, in cases where the property retains integrity of setting and the setting of the resource contributes to its significance. Mitigations CULT-2A through –2C provide an appropriate programmatic approach for addressing potentially historic structures by: (A) identifying all buildings that will be 50 years or older by the time of project construction; (B) assessing the significance of potential historic structures under CEQA and avoiding modifications to such a building, if possible; (C) conducting remodeling or renovations in compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties, or (D) thoroughly documenting buildings that would be demolished or otherwise substantially altered.

As indicated in the Draft EIR (page 4.4-15 and –16) the CEQA Guidelines (15126.4(b)(2)) note that in some circumstances, documentation of a historical resource will not mitigate the effects of demolition of that resource to a less-than-significant level. For instance, a historic building could derive exceptional significance because of its associations with a significant event or person not represented elsewhere, or because of exceptional architectural merit or construction. Some values of this kind are not fully preserved through documentation or data recovery. Mitigation CULT-2C (iv) acknowledges that if the nature and significance of the building is such that its demolition or destruction cannot be fully mitigated through documentation, the campus shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications to the proposed project that would allow the structure to be preserved intact. These could include project redesign, adaptive reuse, relocation or abandonment.

Although the campus would prefer to preserve such a resource where possible, there may be cases in which avoidance or preservation of such a resource is not feasible. If a highly exceptional historical resource cannot be preserved in place, and if the historic values it represents cannot be fully captured through documentation and data recovery, impacts to the resource cannot be fully mitigated. In such cases, the Draft EIR concludes that Mitigation CULT-2C would reduce the impact to the extent feasible; however, the impact nonetheless would be significant and unavoidable.

If and when redevelopment of the blocks in UPS are proposed, the campus would have to conduct additional environmental review under CEQA and would proceed through the steps identified in Mitigations CULT-2A through –2C, as the basis for determining how and/or whether to proceed with redevelopment in this area.

#### **Master Response 14. Regional Housing Supply Impacts**

This Master Response addresses comments 2-1, 2E-17 through 2E-20, 39-5 through 39-19, and others. This response addresses the net increase in new SF State affiliates requiring housing, the number of new students coming from outside the Bay Area, assumptions about regional residence patterns, and other issues raised in these comments related to the Draft EIR’s analysis of housing supply impacts. The response also addresses comments related to the potential for displacement of existing tenants in UPS and UPN as a result of redevelopment in these areas. Please also see Master Response 10, *Campus Population Growth Evaluated in the Draft EIR*, which addresses the net increase in new SF State affiliates that would result from growth and development under the Campus Master Plan.

*New SF Affiliates Coming From Outside the Bay Area*

A comment from the City and County of San Francisco Planning Department questions the Draft EIR’s assumption that 50 percent of new students would come from outside the Bay Area and would be considered new to the study area. The comment further indicates that documentation and/or support for this assumption should be provided. The Draft EIR assumes that about 50 percent of all new students would come from outside the Bay Area and therefore would be new to the study area, based on 2006 enrollment data provided by SF State (Office of University and Budget Planning, 2007A and 2007B). As shown in Table 4.2-1 below, that data shows that about 50 percent of first-time freshman come from outside the Bay Area. Further, about 32 percent of transfer and graduate students come from outside the Bay Area. Taken as a whole, about 39 percent of all new students come from outside the Bay Area, based on 2006 enrollment data. However, to be conservative, the Draft EIR assumed that 50 percent of all new students would come from outside of the Bay Area.

**Table 4.2-1  
New Students by County of Origin at Time of Application  
(2006 Enrollment Data)**

County at Time of Application	First Time Freshmen		Transfer and Graduate Students		Total New Students	
	Number	%	Number	%	Number	%
Bay Area Counties <sup>1</sup>	1,650	50.6	3,464	67.8	5,114	61.1
Other California Counties and Elsewhere	1,608	49.4	1,647	32.2	3,255	38.9
<i>Total</i>	3,258	100	5,111	100	8,369	100

Source: SF State Office of University and Budget Planning, First-Time Freshmen by County of Institution of Origin and New Transfer and Graduate Students by County at Time of Application, June 2007.

Notes

1. Bay Area counties include Alameda, Contra Costa, Marin, San Francisco, San Mateo, and Santa Clara.

The Draft EIR also assumed that all of the new faculty and staff would be new to the study area, which is a very conservative assumption, given that locals may fill many of these positions.

The Draft EIR further assumed that only those students, faculty, and staff new to the study area would require housing. While some new students that come from within the Bay Area may also seek more proximate housing in order to attend SF State, this number is expected to be relatively small given the presence of rapid transit. It should be noted that in the data reported in Table 4.2-1 only those Bay Area counties that have good access to rapid transit were considered to be within the Bay Area, when considering where new SF State population may be coming from (i.e., Alameda, Contra Costa, Marin, San Francisco, San Mateo, and Santa Clara). Those Bay Area counties that don’t have relatively good rapid transit access were considered outside the Bay Area (i.e., Sonoma, Napa, and Solano).

Also, as noted in Master Response 10, *Campus Population Growth Evaluated in the Draft EIR*, the estimate of the net increase in total new students is conservatively high, as it is based on the existing FTE

to head count ratio. As the campus moves more towards a residential campus and away from a commuter-campus model, the gap between FTE and headcount will close. This is due to the fact that students attracted to a residential campus are more typically full-time students, rather than part-time students. Further, as described above, the housing analysis overestimates the number of new SF State affiliates that would be new to the study area and would require housing. Taking these two factors into account, the analysis of housing supply impacts likely accounts for the limited number of new SF State affiliates already living in the Bay Area that may seek new housing closer to the SF State campus.

#### *New SF Affiliates Seeking Off-Campus Housing in San Francisco*

Another comment from the City and County of San Francisco Planning Department indicates that the EIR assumes that students first choose whether or not they want to live in San Francisco, and if so, whether or not to live on campus. They further indicated that the analysis reverses the actual process by which new affiliates seek housing. The Draft EIR did not make such an assumption. Rather, as indicated on Draft EIR page 4.10-11, the number of students that will live in San Francisco was identified, based on the application of the Association of Bay Area Governments (ABAG) regional residential patterns. This data indicates the 56 percent of those working in San Francisco also reside in the City, with the remaining 44 percent living elsewhere in the Bay Area (see Draft EIR page 4.10-5). These patterns were applied to students, faculty and staff. Of the total that would live in San Francisco, the number living on campus was simply subtracted from the total, to determine the number living off-campus in San Francisco, which constitutes about 19 percent of students not housed on campus, as originally reported in the Draft EIR. This was not an attempt to indicate the sequence in which new students may go about seeking housing, but was rather a straight application of the ABAG regional residence patterns. (It should be noted that with the additional on-campus housing provided under the final Campus Master Plan, it is estimated that no additional student would live off-campus in San Francisco. See Chapter 3, *Changes to the Draft EIR*, which accounts for the project refinements proposed in the final Campus Master Plan.

The comment goes on to indicate that 51 percent of the students that would live off campus would live in San Francisco, rather than the 19 percent originally reported in the Draft EIR. The 51 percent figure is based on the application of the regional residential patterns indicated above to the total existing 26,596 student population, taking into account the existing number of students that live on-campus. Based on the above, the comment further indicates that 51 percent should be applied to the total number of new students that would seek housing off-campus, as shown in Table 4.10-5) to determine the number of students that would be seeking housing in San Francisco. While it is true that about 51 percent of the existing off-campus student population would be expected to live in San Francisco, based on the ABAG residential patterns, it is not appropriate to apply that percentage to the total number of new students expected to be seeking housing off campus by 2020, as described below.

The 51 percent figure is based on the total existing student population, whereas the housing analysis provided in the Draft EIR is based on the net new student population expected to be new to the study area. (As indicated above, the Draft EIR assumed that 50 percent of the total new student population is expected to come from outside the Bay Area and is therefore considered new to the study area.) These two sets of numbers are not directly comparable and therefore the mathematical relationships between

them will be different, even though both are based on applying the same regional residential patterns. To provide a comparable analysis to that performed in the City's letter, the ABAG regional residents patterns could be applied to the total student population in 2020. If such an analysis were performed, the results would be the same as those originally reported in the Draft EIR.<sup>1</sup> The Draft EIR directly applied ABAG regional residential patterns only to the new student population in the study area, to simplify the analysis, which is appropriate. This approach was also appropriately used for evaluating the housing demand associated with new faculty and staff.

### *Occupancy of On-Campus Housing*

The Draft EIR also made a conservative assumption about the occupancy of the new on-campus housing. The Draft EIR assumed that 50 percent of the new on-campus housing would be occupied by students at 3 students per unit and that 50 percent would be occupied by faculty and staff at 1 SF State affiliate per unit. In fact, it is very possible that up to 75 percent of the new on-campus housing would be occupied by students. Therefore, the proposed on-campus housing could actually accommodate more SF State affiliates than estimated in the EIR. The assumption that 50 percent of the new on-campus housing would be occupied by students was made to provide for worst-case analysis of the increase in demand for off-campus housing.

### *Conversion of Existing Housing In UPN and UPS*

Another comment from the City and County of San Francisco Planning Department indicates that Table 4.10-8 (Impact POP-3) fails to account for the units in UPN and UPS that would be utilized by SF State and therefore would no longer be available to the "general public." As indicated on Draft EIR page 4.10-4 it is projected that by 2020 about 85 percent of the units in UPN and UPS could be converted to SF State uses. Conversion of housing refers to units of housing in UPN and UPS that are currently occupied by non-SF State affiliates that will ultimately be turned over for University use if and when existing tenants voluntarily vacate their units through 2020. Conversion would occur on a voluntary basis, with the exception of the demolition and reconstruction of some units in UPS and UPN. (The demolition and reconstruction of units in UPS and UPN is evaluated in Impacts POP-3 and POP-4).

Conversion of existing housing is not expected to directly increase housing demand for a number of reasons. First, as the conversion of housing relies on and can only occur if tenants voluntarily vacate their units, the number of units actually converted by 2020 may be lower than that projected in the Draft EIR. Second, as units will be voluntarily vacated, the assumption is that tenants are either moving out of the

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<sup>1</sup> Taking the 32,113 total students in 2020 and applying the ABAG regional residence patterns, 15,079 students would live in San Francisco. If the existing students expected to be living in the City (11,990) are subtracted, the remaining number is 3,089 new students. The Draft EIR assumes that 50 percent of new students will be new to the study area. Applying that percentage, about 1,544 new students would be expected to be actually seeking housing in San Francisco. As 1,270 could be housed on campus based on the original Draft EIR analysis, this leaves about 275 students that would seek housing off campus in San Francisco, which is the same number reported in the Draft EIR (page 4.10-11). The same analysis can be performed for those students that would likely be seeking housing off-campus in other Bay Area locations in 2020. Please also see Chapter 2, *Changes to the Draft EIR*, for revisions to the analysis that account for increased on-campus housing contemplated in the final Campus Master Plan (July 2007).

area, or choosing to move into another existing unit elsewhere in San Francisco, and therefore this conversion would not necessarily translate into an increased demand for housing. Additionally, for tenants living in the units to be demolished that have not already voluntarily vacated their units by the time the reconstruction is to occur, SF State will provide displaced persons with the option to relocate to comparable units in other campus housing in UPN and UPS at their current rents, as indicated in Impact POP-4 (Draft EIR page 4.10-16). (See further discussion of displacement of people below.) Lastly, the SF State population should be considered part of the general public. Even if units in UPN and UPS were not going to be formally converted for SF State uses, SF State affiliates could and would likely continue to move into some or all of these units, as other tenants vacate them. For the above reasons, it is unclear to what extent if any the formal conversion of units in UPN and UPS would translate into increased demand for housing in the local housing market in San Francisco. See revised text in Chapter 3, *Changes to the Draft EIR*, which accounts for the proposed additional housing construction and demolition called for under the final Campus Master Plan (July 2007).

#### *Displacement of People*

Under the Campus Master Plan, redevelopment of the UPN and UPS sites will involve the demolition of some of the existing apartments and the construction of new and replacement units, which would result in a substantial net gain of housing units on campus as a result of new construction. While the project would temporarily displace housing units, it would more than compensate for the loss, and the total housing supply in the study area would increase as a result of the proposed Campus Master Plan. Therefore, the temporary displacement of housing units will not necessitate the construction of replacement housing elsewhere in the region, as described in Impact POP-3 (Draft EIR page 4.10-15).

The redevelopment of blocks in UPS and UPN under the Campus Master Plan would result in the removal and replacement of housing units, which could displace non-SF State people that have not already voluntarily vacated their units by the time this proposed construction takes place. The EIR evaluates this issue in accordance with the standard of significance under the California Environmental Quality Act (CEQA), which indicates that a project would have a significant impact on population and housing if it would “displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.” As the number of units removed is small compared to the projected increase in housing in San Francisco and the Bay Area, this displacement would not necessitate the construction of replacement housing elsewhere, and the impact would be less than significant, as concluded in Impact POP-4 (Draft EIR page 4.10-16).

It should be noted that the final Campus Master Plan (July 2007) contemplates the construction of additional units of housing on campus in response to comments on the Draft EIR. This construction would result in the demolition of 126 additional units of housing in UPN over and above the number contemplated in the draft Campus Master Plan (January 2007). As the number of units that would be removed is still considered small compared to the projected increase in housing in San Francisco and the Bay Area, this displacement would not necessitate the construction of replacement housing elsewhere, and the impact described under Impact POP-4 would continue be less than significant. Please see revised

analysis in Chapter 3, *Changes to the Draft EIR*, which accounts for the proposed additional housing construction and demolition called for under the final Campus Master Plan (July 2007). See also Chapter 2, *Project Refinements*, for additional detail.

The Draft EIR has also been revised to clarify the University's commitment to residents that may be displaced as a result of new housing construction in UPN and UPS (see Chapter 3, *Changes to the Draft EIR*). This revised text indicates that the campus will comply with the California Relocation Assistance Act (Government Code 7260 et seq), which applies to state entities that may displace residents and businesses. This act generally requires that public entities provide assistance and financial payments to persons who are displaced as the result of the acquisition or redevelopment of property for a public use. Financial assistance that may be required would include, for example, moving expenses and temporary rent subsidies. In addition to what is required by the law, SF State will provide displaced persons with the option to relocate to comparable units in other campus housing in UPN and UPS and maintain their current rents.

#### *SF State's Contribution to the Cumulative Housing Supply Deficit*

Impact POP-5 (Draft EIR page 4.10-16) evaluates the project's contribution to the cumulative housing supply deficit in San Francisco and the rest of the Bay Area. To be conservative, this impact identifies a theoretical housing supply deficit by 2020, even though adequate housing supply may be available by 2020 based on recent housing production information and on available information on the number of new units that could be added to the City by that time. The Draft EIR originally concluded that as the project's contribution is relatively small at about 2.5 percent, the SF State-related contribution to this cumulative impact would not be considerable.

As indicated above, SF State has decided to refine the Campus Master Plan to provide for additional on-campus housing, in response to comments on the Draft EIR. Overall, the new housing construction contemplated in the final Campus Master Plan (July 2007) would provide for a total of about 988 new and replacement units (net increase of 657 new units), an increase over the 542 new and replacement units (net increase of 340 new units) provided for in the draft Campus Master Plan (January 2007).

Under the refined project, the project would not likely contribute at all to the cumulative housing supply deficit in San Francisco and its contribution would be reduced in the rest of the Bay Area relative to the project as originally proposed. For more information on these project changes, please refer to Chapter 2, *Project Refinements*. Please also see Chapter 3, *Changes to the Draft EIR*, which accounts for the proposed additional housing construction called for under the final Campus Master Plan.

Moreover, as indicated in the response above, the assumptions and methodologies used in the housing supply analysis contained in Draft EIR Section 4.10 are appropriate and have been accurately implemented. Therefore, additional demand for housing in San Francisco from the project was not identified during the preparation of this Final EIR. Further, the conversion of units in UPS and UPN to

SF State uses by 2020 would not necessarily translate into increased demand in the local housing market, for the reasons stated above.

### **Master Response 15. Transportation Impacts**

This Master Response addresses comments 2-2, 2A-1, 2C-6, 2D-6, 2E-26, 2E-27, 2F-1, 2F-2, and others. These comments question the nature and extent of off-campus transportation-related impacts that were identified in the Draft EIR, the adequacy of identified mitigation, and issues related to the University's fair-share contribution to off-campus improvements.

#### *Campus Master Plan TDM Programs*

The Campus Master Plan provides for a comprehensive transportation demand management (TDM) program to maximize the use of alternative modes of travel and to minimize the use of the single-occupant vehicles (see Campus Master Plan pages 83 through 88, and Draft EIR pages 3-22 through 3-28). In summary, the Campus Master Plan provides for the following:

- Improved on-campus bicycle network including dedicated bike paths, bicycle racks, secure bicycle parking facilities, and on-campus bike station;
- Pursuit of a universal transit pass program to provide free access to transit for SF State affiliates;
- Improved SF State shuttle services to increase the capacity of these services between the Daly City BART Station and the campus;
- Expanding existing campus carshare program to reduce parking demand;
- Parking management, replacement, and fee restructure programs designed to ensure that single-occupant vehicle use does not increase;
- Participation in local processes affecting bicycle access, transit services, and on-street parking to improve off-campus facilities and services; and
- Transportation management activities by existing SF State full-time transportation staff related to above programs.

Along with a housing program to increase the amount of on-campus housing, the expanded and enhanced campus TDM program identified above, is intended to avoid increasing the number of daily and peak hour vehicle trips to the campus. Moreover, pursuant to Mitigation TRA-1, the campus will conduct regular cordon counts and make additional improvements to its TDM program to ensure that new vehicle trips are not generated. See further discussion of Mitigation TRA-1 below under Traffic Conditions.

Traffic, transit, pedestrian, and parking issues are further described below as they relate to the analysis of these issues in the Draft EIR and key comments raised during the public review of this document.

#### *Traffic Conditions*

Draft EIR Impact TRA-1 addresses the contribution of the proposed Campus Master Plan to traffic at study intersections in southwest San Francisco (page 4.11-24). To avoid increasing the number of daily and peak hour vehicle trips to the campus, the Campus Master Plan includes an expanded and enhanced Transportation Demand Management (TDM) program that emphasizes alternate travel modes (see

description above) and a housing program that is designed to house more of the SF State affiliates on the campus. The timely and successful implementation of these programs included in the Campus Master Plan would help avoid increases in vehicle trips. The Draft EIR presents potential traffic impacts under two scenarios: (1) an analysis of likely traffic impacts assuming that the Campus Master Plan TDM and housing programs are successfully implemented, and (2) a conservative worst-case analysis that assumes that the proposed TDM and housing programs are not implemented successfully or in a timely manner, and therefore new vehicle trips would be added to study area roadways and intersections.

Scenario 1 concludes that the combined effect of the TDM, parking, transit, and housing programs will likely be to maintain campus-related auto traffic levels at their current rates through 2020, and the impact at the study area intersections would be less than significant. Scenario 2 concludes that: (1) Lake Merced Boulevard/South State Drive and (2) Lake Merced Boulevard/Font Boulevard would be significantly affected with the addition of project traffic under Year 2020 Conditions. It should also be noted that the Year 2020 conditions with and without the project under Scenario 2 were reanalyzed as part of the Final EIR to account for the reduced size of the proposed 77 Cambon project that was considered in the Year 2020 traffic analyses. Please see Comment Letter 12 for detailed information about the 77 Cambon project. The additional analysis confirms the findings of the Draft EIR, as the proposed project would continue to trigger the significance thresholds at only the two intersections identified above. Please refer to Response to Comment 12-3 for additional information about this additional level of service analysis. Please also refer to Chapter 3, *Changes to the Draft EIR*, for revised Tables 4.11-7 through 4.11-10.

It should also be noted that the additional level of service analysis for 2020 conditions did not reflect the project refinements contemplated in the final Campus Master Plan (July 2007). See Chapter 2, *Project Refinements*, for further information. As these refinements would reduce project trips due to the provision of additional on-campus housing, the analysis provided in the Draft EIR and updated in the Final EIR was determined to constitute a conservative worst-case analysis of the likely effects of the project on vicinity traffic conditions.

To ensure that that automobile traffic levels remain at their current rates through 2020, the Draft EIR indicates that the campus will implement Mitigation TRA-1, which calls for: (1) baseline and on-going cordon surveys to monitor PM peak hour vehicle trips every three years and no later than the addition of each 1,000 students, (2) annual cordon surveys if surveys above show that the PM peak period auto trips are greater than 5 percent above the baseline, (3) additional TDM programs if auto trips increase sufficiently, and (4) fair-share contribution towards intersection improvements at the two study intersections noted above if the additional TDM programs fail to reduce traffic impacts (see Draft EIR page 4.11-24 for the detailed language of the measure). Please see Chapter 3, *Changes to the Draft EIR*, for revisions to this measure that seek to clarify how it will be implemented.

City and County of San Francisco Planning Department comments indicate that the City should conduct the monitoring (e.g., cordon surveys) annually at SF State's expense. However, Mitigation TRA-1, summarized above, is a reasonable and responsive approach to the City's concerns, as the measure

includes monitoring every three years, yet no later than the addition of each 1,000 students in enrollment. Further, conditions are identified under which surveys would be conducted on an annual basis (see item 2 above). SF State is engaged in discussions with the City regarding appropriate roles and responsibilities related to this monitoring, as further described below.

The Office of the City Attorney has commented that Mitigation TRA-1 constitutes an improper deferral of mitigation under the CEQA Guidelines and is contrary to the holding in the *City of Marina v. Board of Trustees of the California State University*, 39 Cal. 4<sup>th</sup> 341 (2006) (“*City of Marina*”) because it is a commitment to pay fees without any evidence that mitigation will actually occur. On the first point, the mitigation does not constitute an improper deferral of mitigation under CEQA Guidelines 15126.4(a)(1)(B), as the measure provides for performance standards in accordance with this section. Performance standards include: timing elements related to baseline and ongoing cordon surveys, traffic conditions under which on-going surveys will be conducted annually, traffic conditions under which additional TDM programs will be implemented, and traffic conditions under which the campus will contribute its fair share of the cost of the two intersection improvements.

On the second point, the mitigation is not contrary to the *City of Marina* case, because the Draft EIR does not rely on the payment of fees and implementation of intersection improvements to make a finding that the impact would be reduced to a less-than-significant level. Rather, the mitigation measure is structured so that intersection improvements are a last resort to be implemented only if campus PM peak hour trips increase sufficiently and additional TDM measures fail to reduce new vehicle trips. While full mitigation may, but is unlikely to, require off-campus capital improvements that are beyond the jurisdiction of the CSU and because it is uncertain whether the City will implement the proposed intersection improvements, the impact is determined to be significant and unavoidable, as is appropriate under CEQA. Please also see Response to Comments 2D-11 and 2D-12, which indicates that the proposed intersection improvements are feasible to implement from an engineering standpoint.

The City has not identified any specific capital improvement projects that it plans to undertake due in whole or in part to the Campus Master Plan. Therefore, it is uncertain whether the City will implement any proposed intersection improvements. In the unlikely event that off-campus capital improvements are required and the City chooses to implement such improvements, the campus would contribute its “fair share” of the cost of such improvements to the City.

The University believes that the mitigation package identified in Mitigation TRA-1 is responsive to the City’s concerns and that overriding considerations outweigh any remaining significant and unavoidable impacts. Nonetheless, the University is engaged in discussions with the City regarding any anticipated off-campus impacts and will continue to do so in good faith in an effort to reach a mutually agreeable resolution on any points of contention. The University has been conducting its discussions with the City through the Mayor’s Office, pursuant to the request of the City Attorney. Please also see Response to Letter 2F for additional information.

### *Transit Demand*

Draft EIR Impact TRA-2 addresses the contribution of the proposed Campus Master Plan to transit demand (page 4.11-29). The transit impact analysis provided in the Draft EIR was conducted for the PM peak hour (5:00-5:59 PM) in accordance with the City and County of San Francisco's *Transportation Impact Analysis Guidelines for Environmental Review*. These guidelines call for a screenline analysis based on the "capacity, ridership and load factors during PM peak hour conditions for the affected transit lines." Moreover, the PM peak hour is also when peak loads on the Muni system occur.

This analysis indicated that the four Muni screenlines would operate at levels far below Muni capacities, based on Muni's passenger load standard of 85 percent. Therefore, the addition of new Muni riders generated by the Campus Master Plan would not substantially impact the peak hour capacity utilization at the screenlines. However, given the unavailability of M-line ridecheck data, it was not possible to calculate current or projected ridership for the M-line. As a result, peak hour trips associated with campus growth could not be added to existing or projected trips to determine if the M-line would be over capacity. Under existing conditions, M-line total capacity at the campus in the peak hour is approximately 2,424 riders; therefore, assuming no changes in M-line capacity, the new passengers from the campus were estimated to represent approximately 3 percent of M-line total capacity at the campus in the peak hour. However, observations of passenger loads on the M-line platform at SF State, as well as standing loads on the M-line vehicles suggest that the addition of campus riders to M-line would exacerbate the crowding and worsen the capacity problems on this line.

The Draft EIR indicated that the City and County of San Francisco has already identified this problem, and is suggesting remedies as part of two ongoing projects: (1) The San Francisco County Transportation Authority's 19th Avenue Project, and (2) The San Francisco Municipal Transportation Agency's Transit Effectiveness Project (TEP). The 19<sup>th</sup> Avenue Project is considering multimodal solutions for 19<sup>th</sup> Avenue, including Bus Rapid Transit service. The TEP is looking at a variety of planning, operations and capital solutions to enhance Muni performance systemwide, but is not yet to the point of making specific recommendations at the route level. If these improvements were implemented, the Draft EIR concludes that they would be more than sufficient to meet the campus's additional transit travel demands and the impact on the M-line would be less than significant. However, these improvements are only in the early planning stages and are under the jurisdiction of Muni or SFCTA to implement and the University cannot guarantee their implementation. Therefore, the Draft EIR concluded that the impact on the M-line is considered significant. Campus growth under the Campus Master Plan would also result in overcrowding and capacity problems on the Campus Shuttle.

To reduce impacts on the M-line and the Campus Shuttle to a less-than-significant level, the campus will implement Mitigations TRA-2B and -2C, which call for: (A) the extension of the Campus Shuttle service to West Portal Station to bypass the overcrowded segment of the M-line based on a program to determine whether and to what extent SF State growth is contributing to identified capacity problems over baseline conditions; and (B) the monitoring of campus shuttle peak hour capacity utilization on an annual basis between the campus and the Daly City BART station and increasing shuttle frequency or adding higher-

capacity services until adequate capacity is provided. It should be noted that these measures have been revised to clarify how they would be implemented. Additionally, a new transit mitigation measure (Mitigation TRA-2A) has been added to indicate that the San Francisco Municipal Transportation Agency (MTA) and the San Francisco County Transportation Authority (SFCTA) can and should implement improvements to transit services along 19<sup>th</sup> Avenue via the implementation of MTA's Transit Effectiveness Project and SFCTA's 19<sup>th</sup> Avenue Project. However, as this measure is under the jurisdiction of Muni or SFCTA to implement, the University cannot guarantee its implementation. While that is the case, implementation of Mitigation TRA-2B would ensure that the impact on the M-line would be reduced to a less-than-significant level. Please see Chapter 3, *Changes to the Draft EIR*, for the new mitigation measure and for specific revisions to the other measures.

Comments from the City and County of San Francisco Municipal Transportation Agency (MTA) indicated that transit demand from universities do not generally correspond to standard peak hour times. While the Draft EIR based its transit analysis on the City and County of San Francisco's *Transportation Impact Analysis Guidelines for Environmental Review*, which calls for a standard PM peak hour analysis for transit, an additional assessment was conducted to account for the time period that represents the peak hour of activity for SF State. Please see Appendix B, *Transit Impact Analysis*, for the detailed analysis of transit impacts. This revised analysis also accounts for the changes contemplated in the final Campus Master Plan (July 2007), mainly the increased number of new students and employees that would be housed on campus (see Chapter 2, *Project Refinements*, for further information).

To determine this campus peak hour, Muni ridership data was analyzed for the stops directly adjacent to SF State to determine the time periods of highest activity, which was determined to be 8:00-8:59 AM. The revised analysis confirms the conclusions originally provided in the Draft EIR for Impact TRA-2, which are summarized above. The Draft EIR analysis has been revised to reflect the new analysis of transit impacts. Please see Chapter 3, *Changes to the Draft EIR*, for revised text.

Comments from the City and County of San Francisco MTA and Planning Department indicate that SF State should cover capital and operating costs of additional service and equipment needed in the peak hours. As indicated above, impacts are identified on the M-line and the Campus Shuttle system. (Please also see Response to Letters 2C, 2D, and 2E for detailed responses to specific comments.) The campus has committed to address any peak transit overcrowding due solely to its expansion by improving the campus shuttle system in the corridors where transit capacity may be a concern, as described above in Mitigations TRA-2B and TRA-2C. This would ensure that identified transit impacts due to growth under the Campus Master Plan would be reduced to a less-than-significant level. However, it should be noted that SF State affiliates pay their way via fares. Additionally, as recommended in the Campus Master Plan, SF State will be pursuing the establishment of a universal transit pass program with BART and MUNI, wherein the University would fund such a pass at a certain price per person per semester, which if implemented could be used as a source of funding for M-line improvements.

The University is engaged in discussions with the City regarding any anticipated off-campus impacts and will continue to do so in good faith in an effort to reach a mutually agreeable resolution on any points of

contention. The University has been conducting its discussions with the City through the Mayor’s Office, pursuant to the request of the City Attorney. Please also see Response to Letter 2F for additional information.

*Pedestrian Conditions/Safety*

Draft EIR Impact TRA-3 addresses whether the implementation of the Campus Master Plan would adversely affect conditions for pedestrians or otherwise interfere with pedestrian accessibility (page 4.11-35). As part of this impact assessment, a pedestrian level of service analysis was conducted along Holloway and 19<sup>th</sup> Avenue. This analysis found that the projected pedestrian volume would be much less than the maximum pedestrian volume that a pedestrian facility can accommodate and still maintain acceptable levels of service. Therefore, the Draft EIR concluded that the increase in enrollment at the campus would not cause substantial overcrowding on public sidewalks, especially the sidewalks and crosswalks near the Holloway and 19<sup>th</sup> Avenue intersection.

The Draft EIR also indicated that existing pedestrian safety concerns on 19<sup>th</sup> Avenue are being addressed by a number of projects under the 19<sup>th</sup> Avenue/Park Presidio Boulevard Transportation Plan. The San Francisco County Transportation Authority’s 19<sup>th</sup> Avenue Study has provided detailed documentation of bicycle and pedestrian safety in the 19<sup>th</sup> Avenue corridor (SFCTA, 2006). It has recommended a variety of improvements to enhance pedestrian safety, including specific recommendations for the 19<sup>th</sup> Avenue and Holloway intersection funded in the Phase 1 list of improvements (see Draft EIR page 4.11-36 for additional information about these projects). These improvements are under the jurisdiction of Caltrans and the City. The 19<sup>th</sup> Avenue Study also notes the relatively modest level of pedestrian collisions and very low crash rate at the intersection of 19<sup>th</sup>/Holloway, as shown in Table 4.2-2, below.

**Table 4.2-2  
Pedestrian Collision Rates**

<b>Intersection</b>	<b>Estimated Pedestrians Crossing per Year (in Millions)</b>	<b>Ped Collisions Between June 1997 and June 2002</b>	<b>5-Year Pedestrian Collision Rate (per Million Pedestrians Crossing)</b>
Lincoln	0.58	4	1.370
Irving	2.81	6	0.427
Judah	2.12	3	0.283
Noriega	0.91	8	1.753
Quintara	0.66	1	0.304
Taraval	3.03	4	0.264
Vicente	0.37	3	1.644
Sloat	0.8	2	0.498
Eucalyptus	2.41	3	0.249
Holloway	9.6	3	0.063
Junipero Serra	0.11	0	0.000

Source: 19th Avenue Study Area – Existing Conditions Report, SFCTA, August 2006, Chapter 6.

The City and County of San Francisco Planning Department has indicated that SF State should pay for a percentage of pedestrian safety improvements. Given that the Draft EIR does not identify significant impacts for pedestrians that would require off-site improvements, it is assumed that the City is referring to the above-mentioned 19<sup>th</sup> Avenue improvements. SF State is willing to pay its “fair share” of pedestrian safety improvements to mitigate significant off-campus impacts related to increased pedestrian trips to the campus that would result from its planned growth. However, the EIR has not identified any such impacts. As noted above, the SFCTA 19<sup>th</sup> Avenue Study includes detailed pedestrian safety recommendations to address existing pedestrian deficiencies in the corridor. Additionally, the Campus Master Plan includes significant capital investments in pedestrian, bicycle and transit facility improvements on campus.

It should also be noted that Draft EIR page 4.11-11 reports on the conditions of pedestrian signals at the intersections of Lake Merced Boulevard/Font Boulevard and Lake Merced Boulevard/South State Drive, based on the Campus Master Plan Existing Conditions Analysis (WRT, 2006). This text indicates that pedestrian signals are either missing or in disrepair. The City and County of San Francisco Municipal Transportation Agency asked in their comments whether SF State would be willing to pay for pedestrian traffic signal improvements at these locations. Based on a field investigation conducted during the preparation of this Final EIR, pedestrian signals do, in fact, exist and are in good repair at the intersections of Lake Merced Boulevard/Font Boulevard and Lake Merced Boulevard/South State Drive. Further, there are no other deficiencies related to the pedestrian crossing at these two intersections. The text of the Draft EIR has been revised to reflect these conditions. Please refer to Chapter 3, *Changes to the Draft EIR*, for revised text.

Overall, the Campus Master Plan, its EIR and comments on the EIR have not identified any necessary off-campus facilities improvements to mitigate significant pedestrian-related impacts associated with campus growth. Nonetheless, the University is engaged in discussions with the City regarding any anticipated off-campus impacts and will continue to do so in good faith in an effort to reach a mutually agreeable resolution on any points of contention. The University has been conducting its discussions with the City through the Mayor’s Office, pursuant to the request of the City Attorney. Please also see Response to Letter 2F for additional information.

#### *Parking Demand/Supply*

Draft EIR Impact TRA-5 addresses whether the project would result in parking demand that exceeds the projected supply (page 4.11-37). Peak parking demand campus-wide is currently only 80 percent of total spaces and occupancy only reaches this peak between 11 am and 2 pm daily (WRT, 2006) (see Draft EIR page 4.11-10). Therefore, the campus currently has adequate parking capacity on campus, as campuses typically use a 90 percent utilization level for parking before adding new spaces (see Draft EIR page 4.11-10). It should be noted that while SFSU charges \$5 a day for parking on campus, as required by law (see discussion below), the City allows one to two hours of free parking on the residential streets around campus, and free unregulated parking on most non-residential streets around campus. Therefore, there is an existing cost incentive that results in SF State affiliates parking in areas surrounding the campus, even though adequate parking capacity is currently provided on campus.

The transportation and parking provisions of the Campus Master Plan ensure that the University will continue to provide adequate parking on campus (see Campus Master Plan, pages 88-89). As part of the long-term vision, the Campus Master Plan proposes a phased replacement of the existing central garage with smaller perimeter parking structures, in order to disperse traffic away from the center of the campus, serve hubs of activity throughout campus, and free the campus core for pedestrians. However, the parking supply overall would not increase for a number of reasons.

First, 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. Rather, parking fees must cover the cost of building and maintaining campus parking. Therefore, parking fees on campus would increase substantially over time to accommodate the construction of proposed new parking. Adding more parking than is contemplated in the Campus Master Plan would further increase the cost of parking and cause campus affiliates to seek off-campus parking in greater numbers. Second, the planned supply of parking is designed to ensure that single-occupant vehicle mode split does not increase in the future and that new single-occupant vehicle trips are not generated, consistent with the City's "Transit First" policy. See Draft EIR page 4.11-39 for more information.

The Campus Master Plan acknowledges that a large number of campus affiliates currently park in the surrounding residential areas, and that if the price of on-campus parking is not managed carefully, additional campus affiliates could potentially choose to park off-campus. To address this, the parking strategy in the Campus Master Plan has been designed to avoid sharp increases in the cost of parking on campus that could occur if too much parking is provided on the campus. However, the campus cannot control commuter parking behavior, and it is expected that some proportion of campus affiliates will continue to park off campus, absent changes to the management of off-campus parking. The City and County of San Francisco manages parking on all public streets surrounding SF State and therefore SF State has no control over parking regulations or fees on City streets.

The Campus Master Plan does however suggest tools the City may use to manage this parking if it chooses (see Campus Master Plan, page 91; and Draft EIR, page 3-28). The City could consider establishing reduced time limits or the institution of fees on the non-residential streets around campus to increase turnover and parking availability. The residents on surrounding residential streets could also request a change to the time limits within the Residential Parking Permit districts so as to discourage students attending one-hour classes from parking free on surrounding streets. The Campus Master Plan also suggests that the City work to establish Parking Benefit Districts adjacent to campus, as is currently being considered by a San Francisco County Transportation Authority project. In such programs, a limited number of neighborhood permits are sold to commuters, with the net revenue being dedicated to local neighborhood improvements. While none of these management tools are under the jurisdiction of SF State, the campus is committed to working collaboratively with the City to develop an appropriate off-campus parking management strategy to minimize spill-over parking in the neighborhoods.

Overall, the proposed project would not have a significant impact related to parking because the parking strategy is consistent with the City's Transit First policy, and the planned supply of parking is designed to ensure that single-occupant vehicle trips are not generated. Moreover, Mitigation TRA-1 requires that cordon surveys are conducted and that additional TDM programs are implemented as necessary to ensure that new single-occupant vehicle trips are not generated. Furthermore, pursuant to the Campus Master Plan, the campus will work with the City to minimize the social impact of campus affiliates parking in surrounding neighborhoods.

Many neighborhood residents commented that more on-campus parking should be provided in order to reduce parking in the neighborhoods. However, further increases in on-campus parking supply above and beyond that called for in the Campus Master Plan would exacerbate rather than alleviate off-campus parking pressures, absent better management of on-street parking, by driving up on-campus parking fees at a faster rate. As the price of parking on campus increases, so will the pressure for commuters to park off-campus. Therefore, while many comments were received that indicate that the Campus Master Plan should provide for more on-campus parking, this would likely further exacerbate off-campus parking, as noted above.

The City and County of San Francisco Planning Department has also indicated that a residential parking placard program should be implemented within a half-mile of the campus and should be paid for by SF State. They also indicated that short-term meters should also be installed and increased parking enforcement conducted at the expense of SF State. However, residential streets within a half mile of campus are already part of Residential Parking Permit Districts 'E' and 'H.' The San Francisco Residential Parking Permit program covers its own costs through permit fees of \$60 a year. To the University's knowledge, no entity has ever paid the City to guarantee free Residential Parking Permits to surrounding residents. Indeed, creating a permanent entitlement to free parking on City streets seems a violation of both the General Plan and the Transit First Policy both of which encourage the removal of parking subsidies and the establishment of market pricing for management of the City's valuable parking resource. In the *San Francisco General Plan, Transportation Element* relevant policies and objectives include:

- OBJECTIVE 31 - Establish parking rates and off-street parking fare structures to reflect the full costs, monetary and environmental, of parking in the City.
- POLICY 16.4 - Manage parking demand through appropriate pricing policies including the use of premium rates near employment centers well-served by transit, walking and bicycling, and progressive rate structures to encourage turnover and the efficient use of parking.
- POLICY 31.1 - Set rates to encourage short-term over long-term automobile parking.
- POLICY 31.2 - Where off-street parking near institutions and in commercial areas outside downtown is in short supply, set parking rates to encourage higher turnover and more efficient use of the parking supply.
- POLICY 2.5 - Provide incentives for the use of transit, carpools, vanpools, walking and bicycling and reduce the need for new or expanded automobile and automobile parking facilities.

Further, the San Francisco Transit First Policy, *San Francisco Municipal Code*, indicates that parking policies for areas well served by public transit shall be designed to encourage travel by public transit and alternative transportation.

Parking on most non-residential streets around the campus is currently free and unregulated. The City may, at its sole discretion, install parking meters on any of these streets. Since the market cost of parking on campus is \$5 a day, the City would net significant revenue from the installation of parking meters, with the capital cost of the meters paid for in short time. Enforcement of parking meters in San Francisco also produces net revenue to the City. Indeed, implementation of the Campus Master Plan will result in a higher market cost for parking on City streets, resulting in greater revenue potential for the City. Since the Campus Master Plan will create the potential for significant revenue benefits to the City and its parking program, it is inappropriate for SF State to pay the City to mitigate any parking revenue impacts. Nonetheless, the University is engaged in discussions with the City regarding any anticipated off-campus impacts and will continue to do so in good faith in an effort to reach a mutually agreeable resolution on any points of contention. The University has been conducting its discussions with the City through the Mayor's Office, pursuant to the request of the City Attorney. Please also see Response to Letter 2F for additional information.

### **Master Response 16. Water and Wastewater Impacts**

This Master Response addresses comments 2F-1 and 2F-2, which indicate that payment for off-campus water and wastewater improvements negotiated under Government Code Section 54999 for the purpose of mitigating environmental effects could satisfy CEQA. However, according to the comments, the possibility of negotiations pursuant to Section 54999 does not satisfy CEQA's requirement that mitigation measures be identified prior to approval of a project and not deferred to some future time.

As explained in the Draft EIR (pages 4.12-11 and 4.12-14), Government Code Section 54999 et seq. authorizes public agencies providing public utility services to charge the University a limited capital facilities fee under certain circumstances. This fee is a non-discriminatory charge imposed by a public utility service agency to defray the actual capital cost of that portion of a public utility facility (as defined in Government Code Section 54999.1 (d)) actually serving the University. The fee would cover the Campus's fair share of the construction costs for such improvements. Under Government Code Section 54999.1(f), "nondiscriminatory" means that "the capital facilities fee does not exceed an amount determined on the basis of the same objective criteria and methodology applicable to comparable nonpublic users, and is not in excess of the proportionate share of the cost of the public utility facilities of benefit to the person or property being charged, based upon the proportionate share of use of those facilities." The agency providing the services has the burden of producing evidence to establish that the capital facilities fee is non-discriminatory (Government Code Section 54999.3(c)). SF State will comply with its obligations as authorized under Section 54999.

The Draft EIR describes the University's commitment to comply with the obligations authorized under Section 54999 et seq. by paying the University's fair share of the construction cost of necessary public

utility facilities, including a fair share of the cost of mitigation measures to address environmental impacts of construction of these facilities. The Draft EIR discusses these University obligations with reference to possible off-campus water and sewer infrastructure (Impacts UTL-1 and UTL-2 on pages 4.12-10 and 4.12-12). The commitment to comply with this statute is not listed in the EIR as a mitigation measure, because it is a legal obligation with which SF State must comply irrespective of environmental impact mitigation commitments made in the EIR. It should also be noted that significant impacts on the physical environment related to water and sewer infrastructure are not anticipated. Therefore, no other mitigation measures would be required. For the above reasons, the issue of deferral of mitigation measures under CEQA raised by the comments is not relevant to off-site improvements that may be required for water and wastewater services.

Please also see Responses to Comments 2B-1 through 2B-9 for further information about the water and wastewater impact conclusions.

### **4.3 RESPONSES TO INDIVIDUAL COMMENTS**

This section presents all written comments received on the Draft EIR and response to individual comments. Comments received at the two Draft EIR public hearings are contained in the two Public Hearing transcripts. Responses to the public hearing comments are presented on the pages that follow the two transcripts. It is recommended that reviewers use the index to comments on pages 4-1 through 4-2 to locate comments from specific agencies or persons and the responses to those comments.