CHAPTER 13
Comments and Responses

The Final Environmental Impact Report includes summarized comments received on the Draft EIR during the public review period; a list of persons, organizations, and public agencies that commented on the Draft EIR; and any other information added by the University as Lead Agency, such as text changes.

This chapter contains the comments received regarding the Draft EIR prepared for UCSF’s 2014 Long Range Development Plan and the responses to those comments. Section 13.1 contains an index to the comments and responses. Comment letters and responses to comments are presented in Section 13.2. Section 13.3 presents the text changes to the Draft EIR initiated by UCSF staff to make editorial changes and corrections to the Draft EIR text. Verbatim written comments made during the Draft EIR public review period (August 15, 2014 to October 14, 2014) and the transcript of the public hearing held on September 22, 2014 can be found in Section 13.2 of this Chapter.

Where appropriate, in response to the comments received, the text of the EIR has been revised. These text changes are identified in Section 13.2 of this chapter within the response to the specific comments which resulted in the change and are cataloged together in Section 13.3. Text additions are indicated by underlined text. Modified text is indicated by the use of strike through text.
## 13.1 Index to Comments and Responses

Table 13-1 lists each commenter, the page number and index code comment contained in the letter or oral testimony, and the page numbers in Section 13.2 where the responses can be found.

<table>
<thead>
<tr>
<th>Commenter</th>
<th>Index Code</th>
<th>Issue</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Governor’s Office of Planning and Research</td>
<td>OPR-1</td>
<td>Compliance with State Clearinghouse CEQA Review.</td>
<td>13-8</td>
</tr>
<tr>
<td>Scott Morgan</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Letter dated September 30, 2014</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>City and County of San Francisco, Planning Department</td>
<td>CCSF-1</td>
<td>City as Responsible Agency.</td>
<td>13-27</td>
</tr>
<tr>
<td>Sarah B. Jones</td>
<td>CCSF-2</td>
<td>EIR threshold of significance and program-level analysis for transit impacts.</td>
<td>13-27</td>
</tr>
<tr>
<td>Letter dated October 14, 2014</td>
<td>CCSF-3</td>
<td>Transit capacity utilization.</td>
<td>13-28</td>
</tr>
<tr>
<td>City as Responsible Agency.</td>
<td>CCSF-4</td>
<td>Future changes in City transit service.</td>
<td>13-30</td>
</tr>
<tr>
<td>Letter dated October 14, 2014</td>
<td>CCSF-5</td>
<td>Motor coach and facilities needs.</td>
<td>13-31</td>
</tr>
<tr>
<td>City as Responsible Agency.</td>
<td>CCSF-6</td>
<td>Response to City transit service shortfall at Mission Bay.</td>
<td>13-32</td>
</tr>
<tr>
<td>Letter dated October 14, 2014</td>
<td>CCSF-7</td>
<td>Secondary effects of providing additional shuttles.</td>
<td>13-33</td>
</tr>
<tr>
<td>City as Responsible Agency.</td>
<td>CCSF-8</td>
<td>UCSF payment of its “fair share”.</td>
<td>13-34</td>
</tr>
<tr>
<td>Letter dated October 14, 2014</td>
<td>CCSF-9</td>
<td>Parnassus Avenue Streetscape Plan impacts on transit.</td>
<td>13-34</td>
</tr>
<tr>
<td>City as Responsible Agency.</td>
<td>CCSF-10</td>
<td>Mission Bay Block P15 pump station capacity.</td>
<td>13-34</td>
</tr>
<tr>
<td>Letter dated October 14, 2014</td>
<td>CCSF-11</td>
<td>Adequacy of Block P15 pump station capacity.</td>
<td>13-35</td>
</tr>
<tr>
<td>City as Responsible Agency.</td>
<td>CCSF-12</td>
<td>Dry weather flows to Mariposa Pump Station.</td>
<td>13-35</td>
</tr>
<tr>
<td>Letter dated October 14, 2014</td>
<td>CCSF-13</td>
<td>Mitigation Measure UTIL-MB-1.</td>
<td>13-35</td>
</tr>
<tr>
<td>City as Responsible Agency.</td>
<td>CCSF-14</td>
<td>Projections of sanitary sewer demand.</td>
<td>13-36</td>
</tr>
<tr>
<td>City as Responsible Agency.</td>
<td>CCSF-16</td>
<td>Public Services, including Recreation.</td>
<td>13-36</td>
</tr>
<tr>
<td>Letter dated October 14, 2014</td>
<td>CCSF-17</td>
<td>Toxic Air Contaminants from stationary sources.</td>
<td>13-37</td>
</tr>
<tr>
<td>City as Responsible Agency.</td>
<td>CCSF-18</td>
<td>Toxic Air Contaminants from Caltrain and Port.</td>
<td>13-39</td>
</tr>
<tr>
<td>Letter dated October 14, 2014</td>
<td>CCSF-19</td>
<td>Some sensitive receptors not in Figure 7.2-1.</td>
<td>13-39</td>
</tr>
<tr>
<td>City as Responsible Agency.</td>
<td>CCSF-20</td>
<td>Mitigation Measure AIR-LRDP-3.</td>
<td>13-40</td>
</tr>
<tr>
<td>Letter dated October 14, 2014</td>
<td>CCSF-21</td>
<td>Clarify source (BAAQMD, 2012b) and analysis.</td>
<td>13-40</td>
</tr>
<tr>
<td>City as Responsible Agency.</td>
<td>CCSF-22</td>
<td>LOS descriptions for intersections #43 and 44 on page 7-80 do not agree with Table 7.14</td>
<td>13-40</td>
</tr>
</tbody>
</table>

UCSF 2014 Long Range Development Plan
Environmental Impact Report
November 2014
<table>
<thead>
<tr>
<th>Commenter</th>
<th>Index Code</th>
<th>Issue</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>City and County of San Francisco, Planning</td>
<td>CCSF-23</td>
<td>In Sections 4.15 and 5.15, it is unclear if LRDP proposals</td>
<td>13-41</td>
</tr>
<tr>
<td>Department</td>
<td></td>
<td>would comply with SF water supply ordinances.</td>
<td></td>
</tr>
<tr>
<td>Sarah B. Jones (cont.)</td>
<td>CCSF-24</td>
<td>Clarendon Trail crosses SFPUC easements.</td>
<td>13-41</td>
</tr>
<tr>
<td></td>
<td>CCSF-25</td>
<td>Other work in the Mount Sutro Open Space Reserve may</td>
<td>13-41</td>
</tr>
<tr>
<td></td>
<td></td>
<td>impact the SFPUC Wastewater infrastructure.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CCSF-26</td>
<td>Site for Gateway Medical Building may include an SFPUC</td>
<td>13-41</td>
</tr>
<tr>
<td></td>
<td></td>
<td>sewer easement.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CCSF-27</td>
<td>Site for Medical Center Phase 2 and Future Parking Garage</td>
<td>13-41</td>
</tr>
<tr>
<td></td>
<td></td>
<td>may include an SFPUC sewer easement.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CCSF-28</td>
<td>Capacity of Block P15 pump station.</td>
<td>13-42</td>
</tr>
<tr>
<td></td>
<td>CCSF-29</td>
<td>Capacity of Block P15 pump station.</td>
<td>13-42</td>
</tr>
<tr>
<td></td>
<td>CCSF-30</td>
<td>Peak sanitary flow capacity of Separated Sanitary Sewer.</td>
<td>13-42</td>
</tr>
<tr>
<td></td>
<td>CCSF-31</td>
<td>Sources of flows to Mariposa pump station.</td>
<td>13-42</td>
</tr>
<tr>
<td></td>
<td>CCSF-32</td>
<td>Flow capacity of Mariposa pump station.</td>
<td>13-42</td>
</tr>
<tr>
<td>Sutro Stewards</td>
<td>SUT-1</td>
<td>2014 LRDP and Management of Mount Sutro Open Space Reserve.</td>
<td>13-53</td>
</tr>
<tr>
<td>Craig Dawson</td>
<td>SUT-2</td>
<td>Management of Mount Sutro Open Space Reserve.</td>
<td>13-53</td>
</tr>
<tr>
<td></td>
<td>SUT-3</td>
<td>Management of Mount Sutro Open Space Reserve.</td>
<td>13-53</td>
</tr>
<tr>
<td></td>
<td>SUT-4</td>
<td>Mount Sutro Open Space Reserve.</td>
<td>13-54</td>
</tr>
<tr>
<td></td>
<td>SUT-5</td>
<td>Update to 1976 Regents’ Resolution and Mount Sutro Open Space Reserve.</td>
<td>13-54</td>
</tr>
<tr>
<td></td>
<td>SUT-6</td>
<td>New trails in Mount Sutro Open Space Reserve.</td>
<td>13-54</td>
</tr>
<tr>
<td></td>
<td>SUT-7</td>
<td>Retaining wall.</td>
<td>13-54</td>
</tr>
<tr>
<td></td>
<td>SUT-8</td>
<td>Mount Sutro Open Space Reserve.</td>
<td>13-54</td>
</tr>
<tr>
<td></td>
<td>SUT-9</td>
<td>Mount Sutro Open Space Reserve.</td>
<td>13-54</td>
</tr>
<tr>
<td></td>
<td>SUT-10</td>
<td>Mount Sutro Open Space Reserve.</td>
<td>13-55</td>
</tr>
<tr>
<td></td>
<td>SUT-11</td>
<td>Wildland fire.</td>
<td>13-55</td>
</tr>
<tr>
<td></td>
<td>SUT-12</td>
<td>Surge building.</td>
<td>13-55</td>
</tr>
<tr>
<td>“UCSF Neighbors”</td>
<td>NEI-1</td>
<td>Aesthetics, housing on Proctor site at Parnassus Heights campus site.</td>
<td>13-58</td>
</tr>
<tr>
<td></td>
<td>NEI-2</td>
<td>Transportation, level of service at Parnassus Heights campus site.</td>
<td>13-58</td>
</tr>
<tr>
<td></td>
<td>NEI-3</td>
<td>Transportation, neighborhood context at Parnassus Heights campus site.</td>
<td>13-58</td>
</tr>
<tr>
<td></td>
<td>NEI-4</td>
<td>Transportation, loading zones at Parnassus Heights campus site.</td>
<td>13-58</td>
</tr>
<tr>
<td></td>
<td>NEI-5</td>
<td>Suggested additional mitigation measures at Parnassus Heights campus site.</td>
<td>13-58</td>
</tr>
<tr>
<td>Commenter</td>
<td>Index Code</td>
<td>Issue</td>
<td>Page</td>
</tr>
<tr>
<td>---------------------------------</td>
<td>------------</td>
<td>----------------------------------------------------------------------</td>
<td>-------</td>
</tr>
<tr>
<td>Pinky Kushner</td>
<td>PK-1</td>
<td>Noise, lights, traffic at Parnassus Heights campus site</td>
<td>13-61</td>
</tr>
<tr>
<td></td>
<td>PK-2</td>
<td>Transportation, noise, shuttles at Parnassus Heights campus site</td>
<td>13-61</td>
</tr>
<tr>
<td>Jackie Sachs</td>
<td>JS-1</td>
<td>Transportation, shuttle stops at Parnassus Heights campus site</td>
<td>13-63</td>
</tr>
<tr>
<td></td>
<td>JS-2</td>
<td>Pedestrian access at Mission Bay campus site</td>
<td>13-63</td>
</tr>
<tr>
<td></td>
<td>JS-3</td>
<td>Golden State Warriors arena project</td>
<td>13-63</td>
</tr>
<tr>
<td>Westlake Urban, Gaye C. Quinn</td>
<td>WU-1</td>
<td>Westlake Urban redevelopment plans for Kirkham Heights Apartments.</td>
<td>13-66</td>
</tr>
<tr>
<td></td>
<td>WU-2</td>
<td>Proctor Building and UC Hall.</td>
<td>13-66</td>
</tr>
<tr>
<td></td>
<td>WU-3</td>
<td>Mount Sutro Open Space Reserve trail.</td>
<td>13-66</td>
</tr>
<tr>
<td></td>
<td>WU-4</td>
<td>Utilities and infrastructure</td>
<td>13-66</td>
</tr>
<tr>
<td></td>
<td>WU-5</td>
<td>Overhead electrical wires and poles on Kirkham Avenue.</td>
<td>13-66</td>
</tr>
<tr>
<td>Tes Welborn</td>
<td>TW-1</td>
<td>Space and population growth seems excessive.</td>
<td>13-69</td>
</tr>
<tr>
<td></td>
<td>TW-2</td>
<td>Average daily population – campus-wide and at Parnassus Heights campus site.</td>
<td>13-69</td>
</tr>
<tr>
<td></td>
<td>TW-3</td>
<td>Return of Millberry Union towers to campus housing.</td>
<td>13-69</td>
</tr>
<tr>
<td></td>
<td>TW-4</td>
<td>Air quality.</td>
<td>13-69</td>
</tr>
<tr>
<td></td>
<td>TW-5</td>
<td>Biological resources.</td>
<td>13-70</td>
</tr>
<tr>
<td></td>
<td>TW-6</td>
<td>Cultural resources.</td>
<td>13-70</td>
</tr>
<tr>
<td></td>
<td>TW-7</td>
<td>Mount Sutro Open Space Reserve.</td>
<td>13-70</td>
</tr>
<tr>
<td></td>
<td>TW-8</td>
<td>Geology.</td>
<td>13-70</td>
</tr>
<tr>
<td></td>
<td>TW-9</td>
<td>Hydrology.</td>
<td>13-70</td>
</tr>
<tr>
<td></td>
<td>TW-10</td>
<td>Land use and planning.</td>
<td>13-70</td>
</tr>
<tr>
<td></td>
<td>TW-11</td>
<td>Replacing services at Langley Porter.</td>
<td>13-70</td>
</tr>
<tr>
<td></td>
<td>TW-12</td>
<td>Setback for New Hospital Addition.</td>
<td>13-70</td>
</tr>
<tr>
<td></td>
<td>TW-13</td>
<td>Population and housing.</td>
<td>13-71</td>
</tr>
<tr>
<td></td>
<td>TW-14</td>
<td>Retaining wall and landslides.</td>
<td>13-71</td>
</tr>
</tbody>
</table>

**Public Hearing on DEIR for the 2014 Long Range Development Plan**

Public hearing, September 22, 2014, Millberry Union Conference Center, 500 Parnassus Avenue, San Francisco, California
13.2 Comments and Responses

This section includes the full text of each comment letter and email received during the public review of the EIR. Each comment in the individual letters and emails is marked in the right-hand margin with an identifying comment number. The responses to each comment are presented in the text that follows the comment letter. Each response is indexed to correspond to the appropriate comment number.

This section also includes the full transcript of the Public Hearing held on September 22, 2014. Since no oral comments were made, no further response is needed.
September 30, 2014

Diane Wong  
Regents of the University of California 
UCSF Campus Planning 
654 Minnesota Street 
San Francisco, CA 94143 

Subject: UCSF Long Range Development Plan 
SCH#: 2013092047 

Dear Diane Wong: 

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 29, 2014, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely, 

Scott Morgan  
Director, State Clearinghouse
In support of its mission, the University of California, San Francisco (UCSF) proposes a new Long Range Development Plan (LRDP) to guide future campus growth through a 20+ year planning horizon to the year 2035. The LRDP will develop land use maps, or "functional zone" maps for each major campus site, that will guide capital construction and infrastructure development to accommodate a building program for campus growth. An LRDP is defined by statute (Public Resources Code Section 21080.09) as a "physical development and land use plan to meet the academic and institutional objectives for a particular campus or medical center for public higher education." Various projects are also proposed.

<table>
<thead>
<tr>
<th>Lead Agency Contact</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>Diane Wong</td>
</tr>
<tr>
<td>Agency</td>
<td>Regents of the University of California</td>
</tr>
<tr>
<td>Phone</td>
<td>415 502-5952</td>
</tr>
<tr>
<td>Address</td>
<td>UCSF Campus Planning</td>
</tr>
<tr>
<td>City</td>
<td>San Francisco</td>
</tr>
<tr>
<td>State</td>
<td>CA</td>
</tr>
<tr>
<td>Zip</td>
<td>94143</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project Location</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>County</td>
<td>San Francisco</td>
</tr>
<tr>
<td>City</td>
<td>San Francisco</td>
</tr>
<tr>
<td>Region</td>
<td></td>
</tr>
<tr>
<td>Lat / Long</td>
<td></td>
</tr>
<tr>
<td>Cross Streets</td>
<td>Multiple</td>
</tr>
<tr>
<td>Parcel No.</td>
<td>Multiple</td>
</tr>
<tr>
<td>Township</td>
<td></td>
</tr>
<tr>
<td>Range</td>
<td></td>
</tr>
<tr>
<td>Section</td>
<td></td>
</tr>
<tr>
<td>Base</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Proximity to:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Highways</td>
<td>Hwy 101, 280</td>
</tr>
<tr>
<td>Airports</td>
<td>No</td>
</tr>
<tr>
<td>Railways</td>
<td>Caltrain</td>
</tr>
<tr>
<td>Waterways</td>
<td>San Francisco Bay</td>
</tr>
<tr>
<td>Schools</td>
<td>Multiple</td>
</tr>
<tr>
<td>Land Use</td>
<td>Multiple</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project Issues</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Reviewing Agencies</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Caltrans, Division of Aeronautics; California Coastal Commission; Department of Fish and Wildlife, Region 3; Office of Historic Preservation; Department of Parks and Recreation; California Highway Patrol; Caltrans, District 4; Air Resources Board; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Statewide Health Planning</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date Received</th>
<th>09/15/2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>Start of Review</td>
<td>08/15/2014</td>
</tr>
<tr>
<td>End of Review</td>
<td>09/29/2014</td>
</tr>
</tbody>
</table>
Governor's Office of Planning and Research
Scott Morgan, September 30, 2014

Response to Comment OPR-1: Compliance with State Clearinghouse CEQA Review

The OPR letter acknowledges that UCSF has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the CEQA.
The City and County of San Francisco (City) is a responsible agency for the UCSF LRDP, as the City will have discretionary approvals in connection to some proposals or mitigation measures within the UCSF LRDP Draft EIR. As a responsible agency, the City appreciates UCSF efforts in working with the City over the last several months regarding the content and scope of the UCSF LRDP Draft EIR. While the Draft EIR addresses many previous concerns communicated by the City to UCSF, the City believes the Draft EIR requires clarification regarding some items. We would like to continue our conversation regarding the comments within this letter. The comments below reflect the combined staff comments from the San Francisco Municipal Transportation Agency (SFMTA), San Francisco Public Utilities Commission (SFPUC), the Office of Community Investment and Infrastructure, and the Planning Department.

COMMENTS:

Transportation

Transit

In many environmental impact topics, the Draft EIR utilizes a threshold of significance consistent with that used by the City. However, in the impact topic related to transit, the threshold of significance in the Draft EIR is substantially different than the City’s. The CEQA Guidelines provide that one should consider whether a project will conflict with a policy established to measure the effectiveness for performance of the circulation system, taking into account all modes of transportation including mass transit. The City measures the effectiveness for performance of its mass transit system based on SFMTA-derived factors for capacity utilization, transit delay and operation costs to the system. The City believes the approach the City uses is appropriate for all projects proposed in San Francisco. The UCSF LRDP Draft EIR identified the threshold of significance for transit as the following:

“The LRDP would have a significant effect on the environment if project demand for public transit causes the need for development or expansion of mass transit facilities, the development of which would cause significant environmental impacts.” (page 4-147)

Under the UCSF LRDP Draft EIR, impacts would need to be overwhelmingly substantial to be considered significant under the LRDP threshold. The City is concerned that such a
high threshold for transit impacts to be considered severe underrepresents the extent of the UCSF LRDP’s impacts on the transit system, as evidenced by the analysis of capacity utilization in the Draft EIR provided for informational purposes. The City can provide all the relevant information UCSF would need to perform an analysis similar to the analyses that the City routinely performs in its CEQA documents (e.g., Transit Center District Plan EIR, California Pacific Medical Center EIR).

Because the City’s transit system is a comprehensive Citywide system, it is important to assess a project’s overall effect on the system. Chapter 5 of the Draft EIR does not provide a program-level analysis of the proposed LRDP’s impacts on transit. Chapters 6 through 9 provide a project-level transit impact analysis of the specific LRDP development proposals at each of the UCSF campus sites. Chapter 10 provides a limited analysis of the cumulative impacts of the proposed LRDP development at the Mission Bay site on transit. Using UCSF’s threshold of significance for transit impacts, none of the analyses in the UCSF LRDP EIR chapters identifies any significant impacts related to transit.

The City does not believe the Draft EIR threshold of significance adequately addresses the impacts that could occur on transit by the proposed LRDP growth, particularly the addition of a daily projected population of 17,031 from an increased square footage of approximately 4,000,000 gross square feet (gsf) at UCSF-Mission Bay by 2040 (Tables 7.0-1 and 7.0-2) which is estimated to result in 33,749 net new daily external person trips, including 14,974 vehicle trips, 7,472 public transit trips, and 5,246 UCSF shuttle trips (Table 3-7 in Appendix G). The City acknowledges that some of the UCSF development is currently under construction and/or previously entitled but the magnitude of the increase demonstrates the importance of a comprehensive analysis of the effect on the transit system. CEQA stipulates that such growth should be addressed in the analysis of cumulative impacts.

Regarding capacity utilization, the Draft EIR identifies that the Existing plus Proposed LRDP would exceed 85 percent capacity during the AM Peak Hour on the T Third and on the 22 Fillmore (both outbound) Muni line/route and during the PM Peak Hour on the 22 Fillmore (inbound) Muni route (pages 208 through 210 in Appendix G). The analysis does not, as the City recommends, include capacity utilization effects for Cumulative plus Proposed LRDP Conditions, which is necessary under CEQA. The Draft EIR states that effects related to capacity utilization are not significant impacts to transit because of UCSF’s different threshold of significance for transit, which is different than the City’s threshold. With regard to the 22 Fillmore, the Draft EIR assumes implementation of the City’s Transit Effectiveness Project (TEP), including the initiation of route 55 and the extension of the 22 Fillmore. Uncertainties with the City’s ability to carry out such actions undermine the conclusion reached.
Changes in service associated with the TEP should be considered in the context of cumulative analysis, as the TEP is itself a project that has not yet been implemented or fully funded. The analysis cannot presume completion of the TEP and thereby conclude that the growth in transit ridership would not be significant. The 55 is a temporary motor coach that the City currently plans to provide to accommodate the growth in Mission Bay, particularly at the UCSF campus and will coincide with the opening of the UCSF Medical Center (February 2015). The City’s current plan is to provide the temporary 55 prior to the extension of the 22 Fillmore, which is also being built to accommodate the growth in Mission Bay and the provision of which will require the construction of new transit facilities. The City has not determined a date for operation of the 22 Fillmore extension. The City does not know whether the TEP’s Moderate or Expanded Alternative (or a combination) for the 22 Fillmore extension will be implemented. Additionally, the long-term funding for the 55 is uncertain. Further, the EIR for the TEP acknowledged that these additional mass transit facilities to serve the growth in Mission Bay, including UCSF, could result in significant environmental effects.1

Either way, the temporary 55 and 22 Fillmore extension will require motor coaches to serve the routes. The motor coaches needed are a combination of 1) coaches that are currently used elsewhere in the Muni system, thus necessitating new coaches elsewhere in the Muni system; or 2) new coaches. The SFMTA is already confronting challenges regarding additional coaches to meet growth and aging, inefficient, earthquake-prone, and over-capacity maintenance and operational facilities and limited funds to improve these facilities. The SFMTA prepared The SFMTA’s Real Estate and Facilities Vision for the 21st Century (Vision)2 in January 15, 2013, which summarizes a number of measures and a roadmap for implementation to address these facilities challenges. Additionally, the SFMTA prepared an Addendum to the SFMTA’s Real Estate and Facilities Vision for the 21st Century, March 11, 2014, as a refinement to some of the coach facilities assumptions in the Vision. The Vision identifies the need for development or expansion of mass transit facilities. The increased need for coaches that will result from providing increased service in Mission Bay will result in an even greater need for development or expansion of mass transit facilities. Even accepting UCSF’s threshold of significance as it relates to transit as a valid approach, the City’s conclusion is that UCSF’s LRDP will substantially contribute to this need for the City’s transit system. The City is interested in how UCSF’s contribution will be addressed, as discussed further below.

2 Available online at: http://archives.sfmta.com/cms/cmta/documents/1-29-13VisionReport.pdf. Note the individual projects within the Vision will be subject to their own environmental review. Footnote 18 in Appendix G is incorrect.
Acknowledging the Vision, the Draft EIR states the following:

“The SFMTA conducted a facilities needs assessment study in 2013. This study determined that many of Muni’s storage, maintenance, and operations facilities are at maximum capacity and not seismically safe and therefore Muni will need to upgrade existing facilities and build new facilities to accommodate transit demand associated with City-wide development.

While the 2014 LRDP would increase ridership on the SF Muni routes serving the four campus sites, this increase in ridership would not exceed the existing or planned capacity of routes serving UCSF. UCSF Transportation Services performs monthly auditing. Should they find that public transit to and from UCSF campus sites does not meet demand, they will adjust shuttle operations (which may include providing additional shuttle service) where necessary to meet demand. Therefore, the 2014 LRDP would not require the expansion or replacement of public transit facilities. If UCSF demand for public transit service requires the construction of facilities that would cause physical impacts, UCSF would contribute its fair share towards the cost.” (page 10-14)

The UCSF LRDP EIR Transportation Impact Study further elaborates:

“The 22 Fillmore would operate at greater than 85% capacity utilization with the addition of LRDP Variant generated trips, but as shown in Table 4-13, with the addition of the interim 55 Route, the combination of the 22 Fillmore and the 55 Route would operate at less than 85% capacity utilization during both the AM and PM peak hours.

The estimated number of LRDP Variant-generated Muni trips traveling to and from the Mission Bay campus site would not require the expansion of transit service or facilities. Long-term funding for the 55 Route is uncertain. If Muni were to discontinue the service, UCSF would replace the transit capacity with shuttle service adequate to fill the gap in transit service. Thus, this analysis includes the 55 Route as a de facto permanent service.3

3 City comment: it should be noted that Appendix G in the Draft EIR identifies that the “operating hours and service frequencies” of the 55 are not yet known (page 70), but Table 4-13 assumes 15-minute headways to substantiate that there is adequate capacity on the route with the proposed LRDP growth. It is not clear how the numbers in Table 4-13 were derived and/or if the service plan is being interpreted correctly. Routes 22 Fillmore and 55 will never run concurrently. In addition, east of Kansas Street, Route 22 and 55 split and only the latter serves the Mission Bay campus. Does the capacity utilization analysis account for this split?
As described in Section 1.2.6, as a matter of course in managing campus operations, UCSF monitors transportation conditions at all campus sites, and, in relation to the proposed 2014 LRDP, would continue to do so in particular at the four UCSF campus sites where development is proposed. Similar to the Parnassus Heights campus site, UCSF would monitor vehicle traffic conditions, transit operations, and shuttle ridership within and surrounding the Mission Bay campus site.

Should the need for additional shuttle service be triggered by increased ridership due to shifts in travel mode or demand generated by the LRDP Variant, UCSF Transportation Services would first review that the additional service would not negatively affect Muni operations. Once implemented, the additional service would be monitored to the same standard as that identified for the 2014 LRDP above. Further, should conflicts between shuttle service and Muni service arise, UCSF Transportation Services would coordinate with SFMTA staff to resolve these conflicts and ensure UCSF shuttles do not negatively affect Muni operations. Additionally, none of the specific proposals of the LRDP Variant would reduce access to or reconfigure transit stops in a way that would degrade transit service to the campus site; therefore the new transit trips generated by the LRDP Variant would result in a less-than-significant impact.”(page 210)

Our interpretation of what the Draft EIR says above is that the system will not meet system performance standards unless the long-term funding of the 55 and/or implementation of the 22 Fillmore extension occurs. Given that this funding is not assured, it is appropriate for UCSF to have identified how to address this issue. The City appreciates UCSF’s proposal to supplement the 55 service with its own shuttles and UCSF’s acknowledgment to pays its “fair share” towards the City’s cost of the construction of new transit facilities. However, the City is unclear on how this commitment would be carried out by UCSF, monitored, reported, and enforced. In addition, the City is also concerned about the ongoing costs of service.

Further, the provision of shuttles raises a number of additional complications. If the funding for the 55 or 22 Fillmore extensions was to not materialize and UCSF were required to meet the demand of those LRDP-related transit riders through shuttles, then this would result in a substantial increase in UCSF shuttles using City facilities (including roads and stops). According to Table 2-15 in Appendix G, five existing routes serve Mission Bay with varying headways and hours of operation serving 4,697 average weekday boardings, which includes existing average weekday boardings at other campuses as well. As mentioned above, the proposed LRDP at Mission Bay would result in 7,472 public transit net new daily person trips and 5,246 UCSF net new daily shuttle trips. This would surely require additional UCSF shuttles and a decrease in their headways to meet the LRDP-related transit demand, in addition to the LRDP-related shuttle growth that would be needed if the projected transit demand would not be
accommodated by the City’s 55/22 muni route modifications. In addition, Muni operates as a system and serves other patrons besides UCSF patrons, therefore, the statement that “UCSF would replace the transit capacity with shuttle service adequate to fill the gap in transit service” seems an unlikely statement to meet the remaining transit demand.

While the City recognizes the value of UCSF shuttles in their ability to reduce single-occupancy vehicle trips, vehicle miles traveled, and private vehicle ownership, the Draft EIR still needs to evaluate the potential impacts these shuttles could have on other components of the City’s transportation system (as well as related to other environmental impact topics, including air quality and noise), in order to comply with CEQA. In particular, additional UCSF shuttle runs on mixed-flow travel lanes along 16th Street and at 16th Street/Mission Street intersection (or other locations shared with Muni, such as near the Parnassus campus) could negatively affect Muni operations by delaying transit and increase operation costs, which could, in turn, require additional coaches to serve the route. As mentioned above, additional coaches could require the construction or development of new mass transit facilities. Any anticipated increase in shuttle service in Mission Bay will trigger immediate discussions between UCSF and the SFMTA over proposed levels of shuttle supply, its impacts on existing Muni service, and efficient methods for accommodating this growth. A way of reducing potential shuttle impacts could be if UCSF worked with the City to join or implement the policies of the City’s Commuter Shuttle and Policy Program.

In regards UCSF paying its “fair share” towards the cost of the construction of transit facilities, the City would like to discuss with UCSF the parameters of the fair share transit costs prior to the Board of Regents hearing concerning the proposed LRDP. In particular, the City would like to discuss and come to an agreement with UCSF regarding the baseline year for monitoring transit trips, responsibilities for monitoring and reporting transit trips, and mechanisms and specifics related to payment of UCSF’s fair share of transit costs.

Parnassus Avenue Streetscape Plan
The City has concerns regarding the Muni stop consolidation described in the LRDP related to the Parnassus Avenue Streetscape Plan. The LRDP does not provide specific details related to the Muni stop consolidation other than stating it would propose consolidating three transit stops on Parnassus Avenue into two transit stops. The LRDP describes this proposal as a way to “improve Muni’s operating efficiency and provide more flexibility with respect to curb space allocation” (page 6-97), while not acknowledging previous concerns from Muni regarding the proposal to remove the stop from the center of the campus and moving stops to the fringe of the campus. Muni patrons using stops in front of the Parnassus campus are also UCSF patrons and employees. Forcing Muni patrons and UCSF patrons to the fringe of the campus will be inconvenient and a disservice to all users. In addition, as described above for additional shuttles operating at the Mission Bay campus, any increase or change in shuttle
operations should be evaluated for their impacts on other components of the transportation system. The City would like to review this Plan as more details of the Plan become known. Any proposed changes to the public right-of-way would require City approvals.

**Utilities and Service Systems**

The following summarizes the SFPUC major comments on the adequacy of the EIR. Please see Attachment A for other SFPUC comments related to the project.

**Block P15**

UCSF proposes to upgrade Block P15 pump station to accommodate LRDP development at the Mission Bay campus sites. The Draft EIR states:

“Potential upgrades proposed by UCSF include the replacement of existing pumps at the pump station with larger horsepower pumps required to serve increased University flow. Pre-existing deficiencies with the pump station as observed by SFPUC will not be corrected by UCSF” (page 3-47).

This latter sentence is also reiterated on page 7-99:

“However the University will only address pump capacity and not any pre-existing pump station deficiencies observed by the SFPUC.”

These latter two sentences should be deleted, as larger flows to the pump station would generally result with more wet well storage utilization, increased frequency of pump operation, additional wear and tear to larger pumps, force main would be under higher pressure and wear and tear, and increase odors due to storage and increased flows. Therefore, UCSF LRDP growth would necessitate improvements to these other components of the pump station as well, not just pump capacity.

In addition, the Draft EIR states:

“The estimated peak flow increase to the pump station on Mission Bay Redevelopment Area Block P15 due to the University’s proposed growth is 159 gallons per minute (0.23 million gallons per day), resulting in the need for pump station capacity of 6.63 million gallons per day. This is below the pumping capacity of the pump station.” (page 7-99)

The latter sentence states capacity based on acceptance testing during the pump station project; however, the City will need to retest to confirm current conditions.
Mariposa Pump Station

The Draft EIR states:

“[A]verage dry weather flows to the Mariposa Pump Station are exceeding previous projections and existing capacity for dry weather flows, which in turn requires occasional use of the wet weather pumps to handle the increased dry weather flows. This flow increase is not a result of UCSF Mission Bay development since developed blocks in Mission Bay do not yet discharge the project flow rate from blocks tributary to the Mariposa Pump Station as defined in the Mission Bay Sanitary Sewer Master Plan.” (page 7-99 and 7-110)

The first sentence is correct; the latter sentence is incorrect. This statement is not a valid assessment of the current situation and will need to be revised. Various UCSF buildings at Mission Bay contribute to the sewer system, such as Block 24. Also, this statement should clearly indicate the UCSF Medical Center (Phase 1) will drain to the Mariposa Pump Station and that it is known at this time that the existing Mariposa Pump Station (dry weather) cannot handle the projected flows anticipated from UCSF Medical Center. The SFPUC is implementing interim improvements to maintain service. However, for UCSF LRDP growth and Phase 2 Medical Center, a long term permanent solution for the Mariposa Pump Station will be required, including potential full replacement.

Mitigation Measure UTIL-MB-1

Based on the improvements required to Block P15 Pump Station and the Mariposa Pump Station, UCSF identifies Mitigation Measure UTIL-MB-1 which would require UCSF to “contribute its fair share to SFPUC for the potential required pump capacity improvements” (Block P15) and “contribute its fair share to SFPUC for the potential required improvements” (Mariposa Pump Station). As stated above, UCSF LRDP growth would necessitate improvements to other components of the P15 pump station as well, not just pump capacity. Therefore, that sentence should be revised. In regards UCSF paying its “fair share” towards the cost of the construction of these facilities, the City would like to discuss and come to an agreement with UCSF regarding the parameters of the fair share costs, including the costs of environmental review for any potential upgrades, prior to the Board of Regents hearing concerning the proposed LRDP.

Projections

The LRDP Draft EIR relies on sanitary sewer demand factors established in the “Mission Bay Separated Sanitary Sewer Analysis” prepared by Olivia Chen Consultants dated December 26, 2000 (referred to as “2000 report” below). Original assumptions in the 2000 report were not compared to actual conditions from a number of UCSF buildings that have been constructed since 2000 to determine if these original assumptions are still valid for the proposed LRDP growth. In addition, it is not clear what sewer demand factor was used for the office/research/biotech uses at the campus (page 2 in the May 2013
Freyer & Laureta report, Appendix H). It is unknown at this time, but these original assumptions may not be accurate and may be the cause of some of the deficiencies related to the existing capacity at the Mariposa Pump Station. Updated assumptions based on actual data from existing buildings should be easily obtained and should be used.

**Population and Housing**

The Draft EIR states:

“Assuming that future students and employees would make the same residential location decisions as current UCSF employees, approximately half of new students and employees would live in San Francisco. There would also be additional population living in those UCSF employee and student households. Assuming only one UCSF employee per household and based on 2.3 persons per household for San Francisco, the total population in San Francisco associated with UCSF growth under the 2014 LRDP would be about 13,000. The share of the City’s 2040 population growth associated with the population growth under the 2014 LRDP would be approximately 5%.” (page 5-69)

The limited analysis states that the LRDP would result in less-than-significant impacts because the induced population growth and associated demand for new housing would not exceed the capacity of the market area, which it defines as the entire San Francisco Bay Area region. However, this defined market area contradicts the sentence that states approximately half of the new students and employees would live in San Francisco and the trip distribution assumptions in the transportation section of the Draft EIR. Because the Draft EIR acknowledges that approximately half of the new students and employees would live in San Francisco, the population and housing analysis needs to identify whether this increase (approximately 13,000 persons) would induce substantial population growth in San Francisco. The proposed LRDP would accommodate approximately 1,960 persons (852 new units * 2.3 persons per household); thus, leaving an unmet demand of approximately 11,000 in San Francisco (plus the additional demand on the region). The City acknowledges that some of this growth is currently under construction and/or previously entitled, but the Draft EIR does not explain how such entitled growth will be accommodated.

The City urges UCSF to revise the Population and Housing analysis so that it is informative and supportable. It should identify whether the proposed project will result in substantial population growth, defined as increases in population that are unplanned (for San Francisco, it should be based on the Housing Element) – that is, without consideration of or planning for infrastructure, services, and housing need to support the proposed residents, employees, and visitors. The California Pacific Medical Center LRDP Draft EIR population, employment, and housing section can be looked to as an example. That project, at the time of the Draft EIR, estimated growth of approximately
only 20 to 25 percent of the UCSF LRDP growth for San Francisco residents and households.

**Public Services, including Recreation**

Page 4-137 in the EIR states “Public service providers that would be affected by the changes in the 2014 LRDP were consulted to determine if new facilities would need to be built, or existing facilities would need to be expanded, in order to maintain current levels of service, including response times, service ratios and other performance objectives.” However, the analysis in the subsequent chapters does not document or demonstrate effectively that this consultation occurred. Furthermore, the analysis appears to rely only on the increased population from the construction of new units at the UCSF campus sites, not the increase demand for San Francisco population and housing indicated in the population and housing section of the EIR. For example, Impact PUB-LRDP-3 states:

> “The estimated number of future students that would be anticipated as a result of proposed residential development under the 2014 LRDP was derived by multiplying the number of students per dwelling unit (the Student Yield Factor) by the number of proposed dwelling units (852 units). The California State Allocation Board Office of Public School Construction reports that the statewide student yield factor per dwelling unit is 0.5 students for grades K through 6 and 0.2 students for grades 7 through 12, resulting in a unified school district average of 0.7 students per household. Using that yield factor, construction of up to 852 units would result in an increase of approximately 596 new students” (pages 5-72 and 5-73).

Using the same yield factors as described above and 5,715 new households, this would result in approximately 4,000 new students, not 596. The analysis needs to evaluate whether 4,000 new students would result in significant environmental effects.

**Air Quality**

**Toxic Air Contaminants**

San Francisco partnered with the Bay Area Air Quality Management District to inventory and assess air pollution and exposures from vehicles, stationary, and area sources within San Francisco. The Citywide dispersion modeling (Citywide modeling) was conducted using AERMOD to assess the emissions from the following primary sources: roadways, permitted stationary sources, port and maritime sources, and Caltrain. PM\(_{10}\) (diesel particulate matter is assumed equivalent to PM\(_{10}\)), PM\(_{2.5}\) and total organic gases (TOG)

---

4 The Population and Housing Section of the Draft EIR states the 2014 LRDP would accommodate an increase in employment and students at all campus sites by approximately 11,430. If half of that new population were to reside in San Francisco, that would result in 5,715 new households in San Francisco.
were modeled on a 20 meter by 20 meter receptor grid covering the entire City. Therefore, the results represent a comprehensive assessment of existing cumulative exposures to air pollution throughout the City. The methodology and technical documentation for modeling citywide air pollution is available in the document entitled, The San Francisco Community Risk Reduction Plan: Technical Support Documentation.5

The Citywide modeling has documented that substantial sources of air pollution in the City include permitted stationary sources, including at both the Parnassus and Mission Bay campuses. The Health Risk Analysis in Appendix E of the Draft EIR does not identify the potential for additional permitted stationary sources as part of the LRDP. Of particular concern are additional permitted stationary sources at the Mission Bay campus. The UCSF Medical Center EIR acknowledges the potential for additional emergency generators at the campus, but these generators were not included in the Health Risk Assessment or criteria air pollutant analysis for the UCSF LRDP Draft EIR. High-rises, as defined in CA Health and Safety Code 13210 of 75 feet tall above the lowest floor level having building access, are required to have backup diesel generators. The LRDP would include buildings with the lowest floor level above 75 feet tall, as described in the Project Description. Additionally the analysis does not take into account other existing sources of toxic air contaminants in the area, including Caltrain and the Port. Lastly, Figure 7.2-1, which was used for the health risk analysis, does not identify the approved and proposed sensitive receptors to the north and south of 16th Street, immediately west of I-280 (residences); UCSF Medical Center; or the San Francisco Unified School District site at Mission Bay.

Mitigation Measure AIR-LRDP-3

Implementation of the 2014 LRDP would result in significant and unavoidable NOx impacts during construction. However, mitigation exists that may reduce the impact to less than significant. Mitigation Measure AIR-LRDP-3 identifies that all off-road equipment shall have engines that meet Tier 3 off-road emission standards or engines that are retrofitted with an ARB Level 3 Verified Diesel Emission Control Strategy (VDECS). The text states the mitigation measure would reduce NOx emissions, which is accurate in relation to Tier 3 off-road emission standards in comparison to fleetwide defaults and what was modeled in the CalEEMod results (Appendix E). However, the mitigation measure also allows for the use of Level 3 VDECS, which most VDECS do not reduce NOx emissions; they reduce particulate matter emissions. In addition, the mitigation measure states, “construction activities shall meet the following requirements that will not be fully implemented via regulation until 2018 (i.e., the equipment is available for purchase or rental at present but its use not mandated throughout all fleets until 2018)” (page 5-20). Presumably the mitigation measure is referring to the In-Use

Off-Road Diesel Regulation, but the facts concerning the regulation are incorrect. Tier 3 off-road emission standards or Level 3 VDECS are not mandated for use by 2018. Instead, this regulation no longer allows fleet contractors to purchase Tier 2 or older equipment. Furthermore, engines that meet Tier 4 (interim and final) off-road engine standards will be more available during the 2015 to 2019 window that this impact would occur than today, which for some horsepower ranges reduces NOx emissions further than engines meeting the Tier 3 off-road emission standards. The City recommends that the Mitigation Measure be revised to require engines meet or exceed Tier 4 off-road emission standards. The analysis should then present the after mitigation results to identify whether the magnitude of this impact is reduced to a less-than-significant level.

**Clarifications**

**Page 5-22**

Please provide the name or link to the source (BAAQMD, 2012b) and analysis to support the best reduction estimates for TDM programs.

**Page 7-80**

The Level of Service description for intersections #43 and #44 on page 7-80 does not agree with the LOS shown on Table 7.14.
Conclusion
Thank you for the opportunity to provide comments on UCSF LDP Draft EIR. Please do not hesitate to contact Wade Wietgreffe of the Planning Department (wade.wietgreffe@sfgov.org) if you have any questions.

October 14, 2014
Date

Sarah B. Jones
Environmental Review Officer
ATTACHMENT A: SAN FRANCISCO PUBLIC UTILITIES COMMISSION COMMENTS
DATE: September 30, 2014

TO: Wade Wietgrefe, Planner, San Francisco Planning Department

FROM: Irina P. Torrey, AICP, Bureau Manager, SFPUC Bureau of Environmental Management


Thank you for the opportunity to review and comment on the Draft Environmental Impact Report for UCSF’s Long Range Development Plan. The SFPUC offers the following comments.

General Comment
Due to the immense size of the Plan and without UCSF providing the SFPUC with relevant title reports and underlying exceptions, the SFPUC cannot at this time identify specific real estate concerns it may have. The SFPUC, however, does not waive any rights it may have regarding its real property or easements that a title report and exceptions reveal that are contrary to its interests. Nor does the SFPCU waive any rights it may have by law to object to the real estate components of the Plan.

Chapter 4, Section 4.9, Page 4-112; Chapter 4, Section 4.15, Pages 4-149 to 4-152; Chapter 5, Section 5.15, Pages 5-81 and 5-82
Page 4-112, Section 4.9 Land Use and Planning identifies that UCSF is not subject to local land use regulations. However, it states "For this analysis, policies "adopted for the purpose of avoiding or mitigating an environmental effect" are considered those that, if implemented and adhered to, would avoid or mitigate physical impacts on the environment".

In Sections 4.15 Utilities and Service Systems and 5.15 Utilities and Service Systems Impacts of the 2014 LRDP, it is unclear if the proposed development would comply with portions of San Francisco’s Recycled Water Use Ordinance, Commercial Water Conservation Ordinance, Water Efficient Irrigation Ordinance, and Restriction of Use of Potable Water for Soil Compaction and Dust Control activities that would avoid or mitigate potential physical impacts on the environment.
All impacts related to water supply are identified as either no impact or less than significant. The EIR does not identify if any of the items in the ordinances listed above would be implemented. The EIR should identify the components of the ordinances above that will be incorporated into the project, particularly if they are relied on for the impact conclusion. For example, the Restriction of Use of Potable Water for Soil Compaction and Dust Control activities requires that construction projects use non-potable water for dust control. It is unclear if the UCSF construction proposes to comply with this City Ordinance or not. Another example is the Recycled Water Use Ordinance, which requires that projects of a certain size and in Designated Recycled Water Use Areas in the city, including Mission Bay, shall have the necessary plumbing installed to enable the future use of recycled water. The SFPUC would appreciate a description in the EIR of how the future municipal recycled water supply would be incorporated into the proposed project at Mission Bay for non-potable uses such as irrigation, toilet flushing or industrial uses and process water.

Chapter 3, Section 3.8.1.5, Page 3-35, Figure 3-10
The Clarendon Trail crosses the SFPUC's easement areas for the Forest Knolls Pump Station and Tank. SFPUC's City Distribution, Natural Resources and Real Estate Services Divisions must review and approve the plans to ensure noninterference with SFPUC facilities and operations. Trails may also present some security concerns, which will require review by SFPUC's Security Division.

Chapter 3, Section 3.8.1.5, Page 3-35, Figure 3-10
Other work within the Mount Sutro Open Space Reserve may impact the SFPUC Wastewater infrastructure. The SFPUC has not fully researched its property rights or ownership of the facilities in this area. However, if work under the LRDP impacts any SFPUC sewer infrastructure, the SFPUC's Wastewater Enterprise must review and approve the plans to ensure noninterference with the infrastructure.

Chapter 3, Section 3.8.2.3, Page 3-44, Figure 3-14
Site for Gateway Medical Building may include an SFPUC sewer easement. The SFPUC has not yet verified its real property interests in this area. However, if UCSF proposes any work within a SFPUC easement or on/adjacent to SFPUC infrastructure, the SFPUC's Wastewater Enterprise and Real Estate Services Division must review and approve the plans to ensure noninterference with SFPUC facilities and operations. If the City has already vacated the easement, the SFPUC will not need to review plans for conflicts with real estate interests.
Chapter 3, Section 3.8.2.3, Page 3-44, Figure 3-14
Site for "Medical Center Phase 2" and "Future Parking Garage" (near 16th Street and Owens - no block number provided) may include an SFPUC sewer easement. If the easement is active (contains SFPUC infrastructure), the SFPUC's Wastewater Enterprise and Real Estate Services Division must review and approve any plans for work within the easement area to ensure noninterference with SFPUC facilities and operations. If the City has already vacated the easement, the SFPUC will not need to review plans for conflicts with real estate interests.

Chapter 7, Section 7.15.1, Page 7-99, first paragraph, first sentence
The Draft EIR states "The estimated peak flow increase to the pump station on Mission Bay Redevelopment Area Block P15 due to the University's proposed growth is 159 gallons per minute (0.23 million gallons per day), resulting in the need for pump station capacity of 6.63 million gallons per day. This is below the pumping capacity of 6.63 million gallons per day."

The pump station at P15 was designed for 6MGD peak according to December 2000 Mission Bay Separated Sewer Analysis; thus, 6.63MGD is above the pumping capacity of the pump station on Park P15.

This P15 pump station should be relabeled as "Mission Bay Sanitary" for clarity.

Chapter 7, Section 7.15.1, Page 7-99, first paragraph, last sentence
The Draft EIR states "However the University will only address pump capacity and not any pre-existing pump station deficiencies observed by the SFPUC."

This statement is not correct. Generally larger flows to the pump station will result with more wet well storage utilization, increased frequency of pump operation, additional wear and tear to larger pumps, force main will be under higher pressure and wear and tear, and increase odors due to storage and increased flows.

Chapter 7, Section 7.15.1, Page 7-99, last paragraph
Previous projections according to the Mission Bay Separated Sanitary Sewer Analysis dated December 2000 indicate a peak sanitary flow of 1.83MGD. The existing Mariposa Pump Station dry weather capacity is approximately 1.2MGD. Original assumptions may not have been physically tested to verify performance.

Chapter 7, Section 7.15.1, Page 7-100, first paragraph, first sentence
The Draft EIR states "This flow increase is not a result of UCSF Mission Bay development since developed blocks in Mission Bay do not yet discharge the project flow rate from blocks tributary to the Mariposa Pump Station as defined in the Mission Bay Sanitary Sewer Master Plan."
This statement is not a valid assessment of the current situation and will need to be revised. There are various UCSF campuses such as the buildings on Block 24 within the Mariposa drainage area in Mission Bay contributing to sewer system. Also, this statement should clearly indicate the UCSF medical center will drain to the Mariposa Pump Station.

Chapter 7, Section 7.15.1, Page 7-100, second paragraph
It is known at this time that the existing Mariposa Pump Station (dry weather) cannot handle the projected flows anticipated from UCSF Phase 1 hospital. The SFPUC is implementing interim improvements to maintain service. However, for future LRDP and Hospital Phase 2, a long term permanent solution for the Mariposa Pump Station will be required, including potential full replacement.
Response to Comment CCSF-1: City as Responsible Agency

Thank you for your comments. To clarify, the City and County of San Francisco has no approval authority over the UCSF LRDP and therefore is not a responsible agency for the UCSF LRDP. There may be specific LRDP proposals for which the City and County of San Francisco has a role in approving or permitting aspects of the project, such as the implementation of the Parnassus Avenue Streetscape Plan, much of which would occur in the public right-of-way, or pump station upgrades, so the City would be a responsible agency for these projects.

Response to Comment CCSF-2: EIR threshold of significance and program-level analysis for transit impacts.

CEQA provides for lead agencies to adopt their own thresholds of significance and to evaluate the significance of a project’s impact based on substantial evidence. Under UCSF’s significance threshold, the LRDP would have a significant effect on the environment if project demand for public transit causes the need for development or expansion of mass transit facilities, the development of which would cause significant environmental impacts. The LRDP EIR analyzed the impact of the LRDP and its proposals on public transit and determined that projected increases in demand for public transit would not cause the need for development or expansion of mass transit facilities. Given the location of the University within a dense urban area where public transit is already widely available, and where the UCSF shuttle system provides an extensive transit network between campus sites for its employees, students, patients and visitors, the development or physical expansion of mass transit facilities would not be required.

The Constitution of the State of California established that the University of California is exempt from local land use control and other local plans, policies, and ordinances. The CEQA Guidelines Appendix G suggested checklist question “Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system . . .” requires an assessment of the project relative to applicable plans, ordinances or policies. City plans, ordinances and policies are not applicable to UCSF. Nonetheless, UCSF voluntarily included an analysis of the impact of the LRDP on public transit relative to the City of San Francisco’s overcrowding standard, or capacity utilization. The comment indicated that transit delay and operation costs to the Muni system are also measures of effectiveness that the City employs. Transit delay was not considered as part of the EIR analysis as only the projected increase in land use at Mission Bay would result in an appreciable increase in the number of new transit and vehicle trips generated by UCSF on a transit corridor. It is important to note that this increase in land use is expected to develop over a 20+ year timeline. Additionally, per page 206 of the Transportation Impact Study (Appendix G of the EIR), UCSF monitors transportation conditions at all campus sites where development is proposed, and, in relation to the proposed 2014 LRDP, would continue to do so in particular at the campus sites where development is proposed. Similar to the Parnassus Heights campus site, UCSF would monitor vehicle traffic
conditions, transit operations, and shuttle ridership within and surrounding the Mission Bay campus site. Additionally, Muni’s operational costs are not a CEQA concern.

The City’s comment on this matter exaggerates the impact of the proposed LRDP on Muni. The EIR analysis indicates that at the Parnassus Heights campus site, out of the 8 transit lines assessed, the proposed LRDP would result in a marginal increase in overcrowding on two transit lines that are already overcrowded (page 200 of the Transportation Impact Study [TIS], which is Appendix G of the EIR) The estimated increase in capacity utilization ranges from 1% to 2% on these already overcrowded transit lines. At Mount Zion there would be no exceedance of the City’s overcrowding standard on any of five transit lines assessed (page 212 of the TIS). At Mission Center there would be no exceedance of the City’s overcrowding standard on any of the 10 transit lines assessed (page 215 of the TIS). At Mission Bay, out of the 3 transit lines assessed, capacity utilization would exceed the City’s standard on two transit lines (pages 208-209 of the TIS). However, transit service enhancements that have long been planned for the Mission Bay area would address this projected overcrowding (see Response to Comment CCSF-3 and CCSF-4).

UCSF does not consider an exceedance of the City’s overcrowding standard on Muni to be a significant physical impact on the environment. Nor does it view the need for a public transit agency to run additional transit vehicles (or “rolling stock”) in order to meet projected transit demand to be a significant physical impact on the environment. Per request of the commenter, an additional city-wide cumulative transit analysis of the effect of LRDP-generated transit trips is included in Response to Comments CCSF-3.

As discussed in Chapter 5 of the Draft EIR (page 5-80), the proposed LRDP’s impacts on the City’s transit system are appropriately analyzed in each of the campus site chapters (Chapters 6 through 9). Cumulative impacts on the City’s transit system are discussed in Chapter 10 (page 10-14), and as discussed there, while there would be a general increase in ridership, the 2014 LRDP would not create excess demand for public transit that would require the development or expansion of mass transit facilities, the development of which would cause significant environmental impacts.

Response to Comment CCSF-3: Transit capacity utilization.

The commenter notes that with the LRDP in place, the T Third and 22 Fillmore during the AM peak hour and the 22 during the PM peak hour would operate above 85% at their respective maximum load points in the vicinity of the Mission Bay campus site. It should be noted that the analysis referenced is an ‘Existing Plus Project’, which assumes that the LRDP components at Mission Bay, which are expected to develop over a 20+ year timeline, were developed and became operational overnight, for lack of a better term. Hence, the analysis is very conservative. Further, The proposed project was assessed against the significance standards (EIR Section 4.14.3) for Transportation and Traffic as found on pages 4-146/148 of the UCSF LRDP EIR.

With respect to Transit, the threshold for significance is if the project were to cause the need for development or expansion of mass transit facilities, which is not warranted by the identified transit lines operating above 85% capacity utilization at their maximum load points in the vicinity.
of the Mission Bay campus site, even for an Existing Plus Project analysis. (See Response to Comment CCSF-2 re: transit significance standard)

An analysis of year 2040 cumulative conditions on SF Muni transit lines has been conducted as part of the Responses to Comments to the Draft EIR. The analysis can be found in the technical memorandum, UCSF 2014 LRDP EIR – Analysis of SF Muni Transit Screenlines for the year 2040.

The cumulative transit analysis evaluated future conditions at the SF Muni transit screenlines in the year 2040. The four screenlines are in the northeast area of San Francisco and represent an aggregation of the major SF Muni routes in San Francisco. They have been established by the Planning Department to analyze potential impacts of projects on SF Muni service, with the latest update prepared by Planning in March 2014. The SF Muni transit screenlines evaluate transit ridership on a weekday during the AM and PM peak hours in the prevailing travel direction, towards downtown in the morning and away from downtown in the evening. Due to the location of the screenlines and the periods of analysis, they are generally used to evaluate projects located inside their boundaries, as those located outside would typically have a minimal effect, if any, on their utilization.

In the case of the 2014 LRDP, only the UCSF Mission Bay campus site is located inside the transit screenline boundaries and has the potential to affect transit utilization. Furthermore, the other major UCSF campus sites (Parnassus, Mount Zion, Mission Center), in addition to being outside the transit screenline boundaries, would be experiencing a relatively low growth in transit ridership as result of the 2014 LRDP, as compared to the Mission Bay campus site.

The transit analysis considered increases in ridership between existing and 2040 conditions as a result of cumulative growth (including the implementation of the 2014 LRDP by UCSF), and changes to SF Muni service resulting from the implementation of the TEP recommendations, the Central Subway Project, the new Transbay Transit Center, etc.

The results of the transit analysis showed that the 2014 LRDP would contribute approximately 740 and 690 transit trips to the SF Muni screenlines in the year 2040 during the AM and PM peak hours, respectively, representing less than 2.5% of the total ridership during each peak hour.

As expected, the largest 2014 LRDP contribution to the SF Muni screenlines was found to occur across the screenline located immediately to the west and south of the Mission Bay campus site (Southeast screenline), with a 4% overall contribution. The T-Third line subcorridor within the Southwest screenline would experience the largest contribution (12% in the AM peak hour and 11% in the PM peak hour). Nonetheless, the T-Third line would be operating at 40% to 42% utilization during the peak hours, which is below the 85% capacity threshold established by the Planning Department.

Those screenlines and subcorridors expected to operate above the 85% capacity threshold in 2040, would experience minimal ridership contribution from the 2014 LRDP, from 1% to 2.4%, which could be considered within the expected daily or seasonal variations of transit ridership. As
a result, the implementation of the 2014 LRDP would not be expected to create any significant cumulative transit impacts on SF Muni operations in the year 2040.

It is important to note that the Existing Plus Project analysis does not include the assumption of implementation of the TEP in the Existing scenarios, but rather the cumulative scenario per the precedent set on other recent major projects to undergo environmental review with the CCSF as the lead agency.

The City has previously stated to UCSF\(^1\) that the temporary 55 shuttle operating from the 16\(^{th}\) Street BART station to the Mission Bay campus site would open for service in Fall 2014, later revised to be coincident with the opening of the Phase One Medical Center at Mission Bay, thus it was assumed in near term analyses included in the EIR.

**Response to Comment CCSF-4: Future changes in City transit service.**

The changes associated with the TEP changes were assumed as part of the cumulative transit scenario and analysis, which has been described in the Response to Comment CCSF-3.

The transit analysis conducted for the 2014 LRDP assumes the operation of a temporary 55 motor coach service by Muni in the near term analysis scenarios, as it is both reasonable and foreseeable (implementation of a motor coach service between Mission Bay and the 16th Street BART Station was approved by the SFMTA Board on March 28, 2014). Per discussions with SFMTA staff, the near term analysis does not assume the 22 Fillmore trolley bus extension to Mission Bay, rather it assumes implementation of the 55 motor coach service and the new alignment of the 22 Fillmore as shown on Figure 2-10 on page 71 of the Transportation Impact Study (Appendix G of the EIR).

Due to uncertainty whether the TEP Moderate or Expanded Alternatives will move forward, both scenarios were assessed in the cumulative traffic impact analysis found on pages 267-279 of the Transportation Impact Study, with the result being that the scenario in which the TEP Expanded scenario and the LRDP are both in place would result in several identified significant traffic impacts within or near the Mission Bay campus site. These impacts were due to the detrimental effects on traffic capacity caused by the removal of existing mixed flow travel lanes on 16th Street being converted into transit-only lanes as documented in both the TEP and LRDP EIRs. As a result, mitigation measures to reduce the traffic impacts generated by the LRDP were identified, including direction to implement the Moderate Alternative of the TEP, implement additional TDM strategies to reduce single vehicle occupancy trips, and to manage the parking supply at the Mission Bay campus site.

Because the City has indicated in their comment that long-term funding for the temporary 55 motor coach service is uncertain, UCSF is committed to replacing the transit capacity shortfall that would be created by its removal with shuttle service (As stated on page 7-92 of the EIR).

---

\(^1\) Email from Jeffrey Flyyn, SFMTA to Kevin Beauchamp, UCSF Campus Planning (3/19/2014).
Response to Comment CCSF-5: Motor coach and facilities needs.

As the comment notes, SFMTA is already confronting challenges with an aging fleet, needs for additional coaches, and needs for facility upgrades, as discussed in the Vision report. Hence, these fleet and facility needs represent existing conditions. The Vision report, dated February 2013, well before UCSF published its Initial Study for the LRDP EIR in September 2013, discusses systemwide challenges, including aging, inefficient, and obsolete facilities, substantial deferred maintenance, some requiring reconstruction; seismically unsafe structures; and yards unable to accommodate already anticipated fleet growth. The City’s comment points to these facility needs and indicates that the proposed LRDP growth will contribute to this need. However, it is clear that these facility needs pre-date the proposed LRDP, and would be required even if the LRDP were not proposed. In addition, the Vision report indicates that the City contemplates developing many mixed use projects on its transit facility land to support new facilities and these mixed use projects may cause significant environmental impacts unrelated to the transit facilities themselves. CEQA requires that the analysis of a project’s impacts be assessed against existing conditions. As discussed above in Response to Comment CCSF-2, the LRDP’s impact on transit facilities would be less than significant, and the LRDP’s effect on transit would be marginal relative to the City’s overcrowding standard. Therefore, the proposed LRDP would not cause the need for development or expansion of mass transit facilities. Nonetheless, UCSF has indicated that it would pay its proportionate share contribution of any significant impacts of development or expansion of public transit facilities caused by LRDP demand, the development of which would cause significant environmental impacts. As no specific expansion of transit facilities caused by proposed LRDP growth has been identified, nor significant environmental impacts resulting from those facilities, it would be premature and speculative to discuss details of UCSF’s proportionate share contribution toward any mitigation. If a future transit facility expansion is identified that is caused by proposed LRDP development and the future transit facility has a significant environmental impact, the following would be necessary to determine UCSF’s proportionate share contribution toward mitigating the significant environmental impact:

1. Baseline date/level from which to measure impact (LRDP EIR)
2. Verification mechanism to determine that the impact has occurred or that the impact will occur shortly.
   a. No advanced payment would occur for projected long term impacts that may not materialize.
   b. Mechanism to measure impacts over time, such as through tiered environmental documents or other monitoring
3. Criteria to determine level of significance of impact
4. Method to calculate UCSF’s proportional share of the impact in terms of the amount of UCSF change since baseline year
Response to Comment CCSF-6: Response to City transit service shortfall at Mission Bay.

As previously noted in Response to Comment CCSF-5, UCSF assumed that the temporary 55 shuttle would be in place in the near term transit analysis of the LRDP.

As noted by the comment, UCSF’s response to a shortfall in transit service at the Mission Bay campus site caused by the discontinuation of the temporary 55 shuttle or a delay in the extension of the 22 Fillmore is to fill the shortfall with shuttle service provided by UCSF. Additionally, as noted in Response to Comment CCSF-5, UCSF has indicated that it would pay its proportionate share contribution of any development or expansion of public transit facilities caused by LRDP demand, the development of which would cause significant environmental impacts. Because no significant impacts have been incurred or contemplated, it is premature to negotiate the details of any contribution at this time.

Tables 4-10 and 4-13 of the Transportation Impact Study (Appendix G of the EIR), have been updated to show the ridership on the 55 16th Street separately from the 22 Fillmore. As shown in these revised tables, shown here as Tables 13-1 and 13-2, all of the LRDP-generated transit trips assigned to the 16th Street corridor (22 Fillmore + 55 16th Street) were assigned to the 55 16th Street since it connects to the Mission Bay campus site. With the addition of LRDP-generated transit trips and the 55 16th Street in place, both routes would operate satisfactorily according to Muni crowding standards.

### TABLE 13-1
TRANSIT CAPACITY UTILIZATION AT MAXIMUM LOAD POINT (WITH ROUTE 55) – MISSION BAY

<table>
<thead>
<tr>
<th>Direction</th>
<th>Existing</th>
<th>Existing Plus LRDP</th>
</tr>
</thead>
<tbody>
<tr>
<td>AM Peak Hour</td>
<td></td>
<td></td>
</tr>
<tr>
<td>22 Fillmore + 55 16th Street</td>
<td>Inbound</td>
<td>193</td>
</tr>
<tr>
<td></td>
<td>Outbound</td>
<td>273</td>
</tr>
<tr>
<td>55 16th Street (east of Connecticut)</td>
<td>Inbound</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td>Outbound</td>
<td>20</td>
</tr>
<tr>
<td>PM Peak Hour</td>
<td></td>
<td></td>
</tr>
<tr>
<td>22 Fillmore + 55 16th Street</td>
<td>Inbound</td>
<td>323</td>
</tr>
<tr>
<td></td>
<td>Outbound</td>
<td>210</td>
</tr>
<tr>
<td>55 16th Street (east of Connecticut)</td>
<td>Inbound</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td>Outbound</td>
<td>23</td>
</tr>
</tbody>
</table>


1 Inbound = away from Mission Bay, Outbound = towards Mission Bay per Muni standard naming convention.
2 Peak Hour Capacity reflects the addition of 55 Route Service with AM and PM peak hour service frequencies of approximately four and a half buses per hour.

TABLE 13-2
TRANSIT CAPACITY UTILIZATION AT MAXIMUM LOAD POINT (WITH ROUTE 55) – MISSION BAY (LRDP VARIANT)

<table>
<thead>
<tr>
<th>Direction</th>
<th>Existing</th>
<th>Existing Plus LRDP Variant</th>
</tr>
</thead>
<tbody>
<tr>
<td>AM Peak Hour</td>
<td></td>
<td></td>
</tr>
<tr>
<td>22 Fillmore + 55 16th Street</td>
<td>Inbound</td>
<td>193</td>
</tr>
<tr>
<td></td>
<td>Outbound</td>
<td>273</td>
</tr>
<tr>
<td>55 16th Street (east of Connecticut)</td>
<td>Inbound</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td>Outbound</td>
<td>20</td>
</tr>
<tr>
<td>PM Peak Hour</td>
<td></td>
<td></td>
</tr>
<tr>
<td>22 Fillmore + 55 16th Street</td>
<td>Inbound</td>
<td>323</td>
</tr>
<tr>
<td></td>
<td>Outbound</td>
<td>210</td>
</tr>
<tr>
<td>55 16th Street (east of Connecticut)</td>
<td>Inbound</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td>Outbound</td>
<td>23</td>
</tr>
</tbody>
</table>

¹ Peak Hour Capacity reflects the addition of 55 Route Service with AM and PM peak hour service frequencies of approximately four buses per hour.


Response to Comment CCSF-7: Secondary effects of providing additional shuttles.

As noted in the comment, additional shuttle trips will be required to meet the growth in shuttle ridership generated by the LRDP, specifically at the Mission Bay campus site. Further, as also noted in the comment, were UCSF to fill the gap in transit capacity with shuttle service, should the temporary 55 shuttle be discontinued or there was a delay in the extension of the 22 Fillmore due to funding issues, the result would mean additional UCSF shuttles using City facilities. UCSF does not know exactly what they City’s response would be to a lack of funding and how it would affect the provision of transit service to the Mission, Potrero Hill, and Mission Bay neighborhoods. Presumably, the City would leave a transit line in place similar to both the frequency and alignment of the current 22 Fillmore. Following this presumption, UCSF assumes that the transit capacity shortfall may require additional service between the 16th Street BART station and the Mission Bay campus site, where the maximum load point of the 22 Fillmore occurs. This area is served by the ‘Red’ UCSF shuttle route, which would increase shuttle service, although to which extent would need to be determined, in the face of a transit capacity shortfall serving the Mission Bay campus site.

The comment notes that secondary impacts, including to air quality and noise in a hypothetical scenario in which UCSF shuttle service would need to be further expanded based on the City’s failure to provide transit service to the Mission Bay neighborhood, should be analyzed. These impacts were not addressed because of the speculative nature of the scenarios and that if the scenarios occurred, the impacts would be the same or similar to the impacts that would occur if the City runs the temporary 55 shuttle, as the vehicle types and headways would be similar.
It should be noted that the assumption of additional shuttle service was included in the near-term and cumulative traffic impact analysis for the Mission Bay campus site found on pages 175-190 and pages 267-279 of the Transportation Impact Study (Appendix G of the EIR) respectively. These analyses include the mixed flow travel lanes on 16th Street.

As it relates to the effect of the increase in UCSF shuttles on Muni operations and City facilities, per page 206 of the Transportation Impact Study, UCSF has stated that should the need for additional shuttle service be triggered by increased ridership due to shifts in travel mode or demand generated by the LRDP, UCSF Transportation Services would first review that the additional service would not negatively affect Muni operations and then once implemented, the service would be monitored to ensure that conflicts between shuttle service and Muni service do not arise. If conflicts were found, UCSF Transportation Services would coordinate with SFMTA staff to resolve the conflicts and ensure UCSF shuttles do not negatively affect Muni operations.

**Response to Comment CCSF-8: UCSF payment of its “fair share”**.

See Response to Comment CCSF-5.

**Response to Comment CCSF-9: Parnassus Avenue Streetscape Plan impacts on transit.**

Although many components of the draft Parnassus Avenue Streetscape Plan have been vetted with both City staff and the community, the development of the Parnassus Avenue Streetscape Plan is still on-going. UCSF is committed to working with the City and SFMTA to ensure stop location, along with others concerns, are addressed while maintaining the goal of creating a sense of place and identity while also balancing the various competing needs of the street. The City of San Francisco, as the approving agency for all projects within the public right-of-way, will need to approve any planned changes to the streetscape, including changes to Muni stops. Individual changes to the streetscape will be submitted to the City for their review on a project-by-project basis once the Plan is finalized.

**Response to Comment CCSF-10: Mission Bay Block P15 pump station capacity.**

UCSF disagrees that the last two sentences should be deleted because it believes the statement to be true; that existing pump station deficiencies should not be the responsibility of the University to correct.

The pump station is variable speed with a single wet well. According to UCSF consulting engineers, the proposed increased horsepower pump would keep up with the increased flow without the need for a larger wet well storage. They disagree that there will be an increased frequency of pump operation. It is anticipated that the frequency would be the same, just at a higher flow rate.

UCSF understands that the City has already received complaints about odor at the pump station. The City approved the design and accepted the construction of this pump station without odor.
control. Increased flow into the pump station will not create the odor issue at the pump station. Further, increased flow does not necessarily increase odors at the pump station.

The existing pump station at peak flow operates at a head of 47’ (20.34 psi). The proposed pump upgrade would result in a head of 52’ (22.51 psi). This increased pressure is minimal and well within the pressure rating of the force main.

**Response to Comment CCSF-11: Adequacy of Block P15 pump station capacity.**

Comment noted. The statement was based on the pumping capacity at the time of acceptance. However, proposed pump upsizing will result in an increase in pump station capacity to 7.34 million gallons per day.

**Response to Comment CCSF-12: Dry weather flows to Mariposa Pump Station.**

The Sewer Master Plan for Mission Bay was approved without the need for Mariposa Pump Station upgrades. The projected peak flow rate from the redeveloped blocks tributary to the pump station was 1,320 gallons per minute (Blocks 24, 25, 31, 32, 33, 34, 36, 37, 38, 39, 40, 41, X3 and X4) per the Master Plan. The developed Blocks draining to the pump station are, at this time, Blocks 24, 25a, X4, and 41, which is a small percentage of the anticipated flow rate shown above. We believe the statement to be correct.

Per Response to Comment CCSF-13, the University is committing to proportionate payment of improvements needed to handle increased flow as a result of development under the LRDP. For future analyses to determine potential pump station improvements due to LRDP development and other development projects currently being planned for the area, UCSF should have access to flow rate information (capacity) on the existing pumps at the station, which the City has not provided. Also, UCSF should have access to information on the run times of each pump and the number of times the pumps operate to assess how much flow is being conveyed.

Furthermore, UCSF understands improvements have recently been performed at the Mariposa Pump Station. UCSF Consulting Engineering should receive information on all improvements (i.e. pumps, force mains, miscellaneous piping, valves, etc.) to fully understand the City’s comments. These improvements were performed after the 2008 EIR prepared for the UCSF Medical Center and it is not clear as to why these improvements did not increase capacity to support the Medical Center.

**Response to Comment CCSF-13: Mitigation Measure UTIL-MB-1.**

The University is committing to a proportionate payment of improvements needed to handle increased flow to the two pump stations as a result of development under the LRDP. See responses above for additional information.
Response to Comment CCSF-14: Projections of sanitary sewer demand.

The University believes that actual conditions are comparable to the wastewater flow factors in the Mission Bay Sewer Study approved by the PUC in December 2000. While the University has accurate total water use data - actual flow meter data characterizing peak flow from the University buildings in this basin do not exist. The University will work with the City in the future to measure flow in City sewers that originate from University buildings within the basin to eliminate the need to make any assumptions. On a separate matter, working with the SFPUC - the University has identified and prioritized projects to increase water conservation – and significantly reduce sewage flows from existing buildings in this basin. The University is committed to further reductions in the future. See also response CCSF-23.

Response to Comment CCSF-15: Population and Housing Analysis.

As discussed on page 4-126 of the Draft EIR: “Population and housing changes, in and of themselves, are not normally considered to be significant impacts (i.e., substantial, adverse impacts on the physical environment) under CEQA, but CEQA does allow inclusion of these effects as indicators of other impacts. Therefore, this analysis quantifies and describes the magnitude of such potential changes. The potential physical environmental impacts associated with changes in population and housing are analyzed in other sections of this EIR (e.g., transportation, public services, air quality). Direct increases in employment can create secondary impacts, such as an increased demand for housing. This housing demand would be considered a significant effect if the housing demand could not be met with existing or future housing supply within the housing market for new UCSF students and employees. While the development of housing itself would not be a significant adverse impact, construction of housing could create other short-term environmental impacts, such as air quality or noise impacts.”

Growth resulting from implementation of the 2014 LRDP would be considered “substantial” if the increases in population or employment are unplanned, i.e., are inconsistent with growth anticipated in planning documents. (See page 4-128 under “Analysis Methodology.”) The vast majority of the increase in population and employment associated with the 2014 LRDP would occur at the Mission Bay campus site. In fact, faculty and staff associated with the Parnassus Heights campus site are projected to decrease at LRDP horizon in 2035. Further, with the new medical facilities, including the hospital and out-patient facilities, there will be substantial numbers of San Francisco residents who will be among the patients and visitors at the Mission Bay campus site.

As discussed in Section 10.4 of the Draft EIR, the Mission Bay Subsequent EIR determined that the projected growth within the Mission Bay Redevelopment Area, which includes the Mission Bay campus site, is not growth-inducing; therefore, growth at this campus site that is in general accord with the Mission Bay Redevelopment Plan would also not be growth-inducing.

Response to Comment CCSF-16: Public Services, including Recreation.

Impacts PUB-LRDP-1 and PUB-LRDP-2 analyzed the increased population (17,000) associated with the 2014 LRDP horizon, not just the increase associated with new housing units, as suggested by commenter. The population increase includes not only students, faculty, and staff,
but also includes hospital patients and visitors, and out-patient medical appointments, a large percentage of whom are expected to be San Francisco residents.

In order to evaluate potential 2014 LRDP effects on public schools in the vicinity of UCSF campus sites, the analysis was based on the increased population associated with new residential units proposed under the LRDP. The number of proposed school age children was based on a conservative statewide rate of 0.7 students per household. However, the San Francisco Unified School District (SFUSD) employs a student generation rate of 0.203 students per housing unit for planning purposes.\(^2\) If half the growth in students and employees attributable to the 2014 LRDP were to reside in San Francisco, this would result in approximately 1,160 new students at LRDP horizon in 2035 (about 60 new students per year over 20 years).

**Response to Comment CCSF-17: Toxic Air Contaminants from stationary sources.**

The comment expresses concern that additional permitted stationary sources at the Mission Bay campus site, particularly back-up diesel generators that would be required by building code, were not included in the health risk assessment or the criteria air pollutant assessment within the Draft EIR for the LRDP.

The future operation of diesel back-up generators was considered in a comprehensive health risk analysis conducted for UCSF which considered full build-out of the UCSF Mission Bay campus site (ENVIRON, 2009) under five scenarios. The scenario which reflects the campus development envisioned under the 2014 LRDP would be Scenario B2 which assumes maximum entitled build out and a central utility plant on Block 16. The analysis of the HRA considered the following sources: Diesel Generators, natural gas fuel boilers, and fume hoods. Diesel generators under scenario B2 included a total of 13 future generators at Block 16, Block 18, Block 19, Block 23, and Block 25 as well as additional four more for the hospital currently under construction. The HRA determined that the maximum on site risk to be those for a resident child with an increased cancer risk of 2 in one million from all sources considered inclusive of existing UCSF sources.

Table 7.2-5 of the DEIR presented the health impacts for the maximally exposed individual at the Mission Bay campus site. The first row of this table presents the health risks at the proposed housing facility from operations of existing stationary sources at UCSF as provided by the BAAQMD (2.3 in one million). Also, the fifth row of Table 7.2-5 presents the increased cancer risk from fume hood emissions associated with future operations under LRDP development (0.02 in one million). Together these risks exceed the predicted value of the comprehensive HRA which included the risks from future generators. Consequently Table 7.2-5 of the DEIR presented an overly conservative estimate of health risk exposure by using estimates provided by BAAQMD which do not consider localized meteorological conditions building downwash, surface parameters and heat island effects that were considered in the comprehensive health risk analysis from 2009.

\(^2\) City and County of San Francisco, *Central SoMa Plan, Initial Study*, February 12, 2014.
Table 7.2-6 of the DEIR presented the health impacts for the maximally exposed individual offsite. The tenth row of this table presents the maximum off-site health risks from all future generators, fume hoods, turbines and boilers under the LRDP as calculated in the 2009 Health Risk Assessment. Consequently, the health risk impact assessment of the 2014 LRDP DEIR did consider the emission from backup diesel generators that would occur under development of the LRDP.

While the potential exists for back up diesel generators to operate at Block 33 and 34 under the LRDP that were not included in the 2009 Health Risk Assessment, it can reasonably be estimated that additional risks associated with such generators which would be located downwind from receptors, would add a negligible additional contribution to cancer risks given the risks estimated for 16 generators presented in Table 7.2-6. It should also be noted that BAAQMD will not issue a permit to any single stationary source exceeding 10 in one million. The SEIR for the Medical Center at Mission Bay identified a mitigation measure for Blocks 33 and 34 requiring an analysis of health risk from any sources developed, which would apply to future development at Blocks 33 and 34.

Operational criteria air pollutant emissions are presented in Table 7.2-4 of the DEIR. Emissions from maintenance testing of backup diesel generators were not included in this table, but would further contribute to emissions of ROG, NOx, PM10 and PM2.5. Maintenance generator operations would be restricted by permit to 50 hours per year and would not be a daily occurrence. Consequently estimating daily emissions accurately depend on the number of generators tested on a given day. Because it would be overly conservative to assume that all 13 new generators would be tested on the same day, as a conservative, yet reasonable testing scenario, it may be assumed that all four Block 15 generators would be tested on the same day as all three Block 25 generators, or about half the new generators on a given day. This would result in an additional 2.9 pounds per day of ROG, 10.3 pounds per day of NOx, and 0.46 pounds per day of both PM10 and PM2.5. Consequently these emissions are added as an additional line item in Table 7.2-4. A text revision to the DEIR is hereby included as indicated below. The addition of these emissions does not change the impact conclusions of the FEIR.

<table>
<thead>
<tr>
<th>Air Pollutant</th>
<th>Estimated Emissions (lbs/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>ROG</td>
</tr>
<tr>
<td>Mobile Sources(^a)</td>
<td>23.14</td>
</tr>
<tr>
<td>Area Sources(^a)</td>
<td>103.4</td>
</tr>
<tr>
<td>Natural gas combustion</td>
<td>3.82</td>
</tr>
<tr>
<td>Generator Testing</td>
<td>2.96</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>130.4</strong></td>
</tr>
</tbody>
</table>

\(^a\) Mobile sources are motor vehicles and trucks. Area sources include landscape maintenance (equipment used for these activities such as gasoline-powered lawnmowers and blowers), maintenance application of paints and other interior and exterior surface coatings, and increased use of consumer products that result in emissions of ROG. Natural gas combustion is for space and water heating.

SOURCE: ESA, 2014 (see Appendix E).
It should also be noted that the comprehensive health risk analysis from 2009 that was cited in the DEIR utilized a more refined methodology than that used by CCSF for its city-wide modeling effort. This is because the 2009 risk assessment considered conditions unique to the Mission Bay campus site, including localized meteorological conditions, building downwash, surface parameters, and heat island effects that were not considered in the city-wide analysis.

Response to Comment CCSF-18: Toxic Air Contaminants from Caltrain and Port.

The comment expresses concern that operations of Caltrain and the Port were not considered in the health risk assessment within the Draft EIR for the LRDP.

An assessment of the potential risk impacts from Caltrain operations were included in the DEIR. Specifically, the sixth row of Table 7.2-5 and the fifth row of Table 7.2-6 present the risk contributions from Caltrain operations as estimated using data provided by BAAQMD. Further, a discussion of these impacts from Caltrain operations is on pages 7-26 and 7-27 of the DEIR and Mitigation Measure AIR-MB-4: Particulate Filtration Systems for Block 15 Housing and Child Care is identified to address these risks.

Potential risks from stationary sources operating nearest the project site were also considered in the DEIR. However, such operations within the Port of San Francisco were not considered because they are over 1,000 feet from the Plan area. BAAQMD guidance for assessing impacts from stationary source emissions identifies a screening distance of 1,000 feet from potential receptors as a limit for assessment. The two closest port sources identified on the eastern water front in the referenced document, San Francisco Community Risk Reduction Plan: Technical Support Documentation (SFCRRP), are BAE systems at the foot of 20th Street and the US Maritime Administration at Pier 50. Both of these sources are over 1,000 feet from the Plan area and were therefore not considered as sources of concern with regard to the assessment of health risk in hazards in the 2014 LRDP DEIR. It should be noted that BAE system installed an electrical shore-side power system in 2012 as part of the Ports efforts to offset emissions associated with the America’s Cup Race of that year which was not considered in the SFCRRP.

Response to Comment CCSF-19: Sensitive receptors not in Figure 7.2-1.

The comment expresses concern that certain approved and proposed sensitive receptors were not identified in Figure 7.2-1. Specifically, the comment speaks to proposed residential uses north and south of 16th Street west of I-280, UCSF Medical Center and the San Francisco Unified School District Site.

Residential uses proposed north and south of 16th Street west of I-280 will be located upwind from the Campus Site. As identified in Table 7.2-6, risks from UCSF Generators, Fume Hoods, turbines and boilers under the LRDP (inclusive of previously approved Hospital and Genentech Hall) would be less than 10 in one million at the maximally exposed sensitive receptor. Risks at the proposed upwind receptor would therefore be less than this value and would be less than significant.
UCSF Medical Center would be considered a sensitive receptor with respect to chronic health index and should have been identified in Figure 7.2-1. However the duration of exposure of hospital patients would be of limited duration (likely less than a month) and was therefore not considered a sensitive receptor with respect to increased risk or annualized PM$_{2.5}$ concentrations. The 2009 Health Risk Assessment did include the Hospital as a sensitive receptor and assumed a one year exposure duration. As identified in Table 7.2-6 of the DEIR, the increased cancer from UCSF Generators, Fume Hoods, turbines and boilers under the LRDP (inclusive of previously approved Hospital and Genentech Hall) would be less than 10 in one million at the maximally exposed receptor. Cumulative risks at the hospital would be less than 100 in one million.

The San Francisco Unified School District Site was identified in Figure 7.2-1 as a recreational receptor.

**Response to Comment CCSF-20: Mitigation Measure AIR-LRDP-3.**

The comment requests corrections and revisions to Mitigation Measure AIR-LRDP-3.

The commenter is correct. The intent of Mitigation Measure AIR-LRDP-3 is to reduce NO$_x$ emissions and VDECS would not achieve this goal. Consequently, a text revision is hereby incorporated to revise Mitigation Measure AIR-LRDP-3. It would be speculative to assume the availability of Tier 4 engines in the construction equipment fleet. Consequently, the analysis and mitigation conservatively assume Tier 3 engines as representing all available mitigation.

**Mitigation Measure AIR-LRDP-3: Off-Road Equipment Control Measures for NO$_x$.**

All off-road equipment greater than 25 hp and operating for more than 20 total hours over the duration of construction activities shall have engines that meet or exceed U.S. EPA Tier 3 off-road emission standards meet the following requirements that will not be fully implemented via regulation until 2018 (i.e., the equipment is available for purchase or rental at present but its use not mandated throughout all fleets until 2018):

a. All off-road equipment shall have:

i. Engines that meet or exceed either U.S. EPA Tier 3 off-road emission standards, or

ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).

**Response to Comment CCSF-21: Clarify source and analysis.**

Sector reductions for transportation demand management measures are presented on page 4-12 and 4-13 of BAAQMD’s 2012 CEQA Guidelines.

**Response to Comment CCSF-22: LOS descriptions.**

The comment is correct. Table 7.14 controls and thus the intersection operation description text that appears on page 7-80 of the EIR should read:
• Mariposa Street and the I-280 Northbound Off-Ramp (Intersection #43) operates at LOS E during the AM peak hour due to the volume of traffic exiting I-280 via the off-ramp.

• Mariposa Street and the I-280 Southbound On-ramp (Intersection #44) operates at LOS F during the AM and PM peak hours, respectively, due to the high conflicting volumes on east and westbound Mariposa Street attempting to access I-280 via the Southbound On-ramp.

This revision does not change the environmental findings of the UCSF LRDP EIR.

**Response to Comment CCSF-23: Water supply ordinances.**

Thank you for your comment. The EIR does not identify if the LRDP would comply with any of the items in the ordinances listed in the comment because the University is not subject to these local ordinances. The University does have its own adopted polices and initiatives, to address the goal of conserving water resources.

The text of those policies can be found here: http://policy.ucop.edu/doc/3100155/Sustainable%20Practices and here http://www.universityofcalifornia.edu/press-room/president-announces-20-cut-uc-water-usage. Specific implementation measures – University specific measures analogous to the measures found in the local ordinances - can be found in the University Facilities Design Guidelines: http://www.ucop.edu/construction-services/facilities-manual/volume-6/vol-6-chapter-5.html

The EIR identifies that new development at UCSF is guided by the Facilities Design Guidelines in “Section 4.1.2 Regulatory Considerations”. It also identifies the UCSF Water Conservation Plan in “Section 4.15.2 Regulatory Considerations”. Lastly, the EIR identifies the UC Policy on Sustainable Practices in “Section 5.15, Utilities and Service Systems Impacts of the 2014 LRDP”.

The University has carefully tailored its program to conserve water to go beyond the SFPUC’s goals. We understand the SFPUC’s combined water conservation and local water supply initiatives have a goal of a 10 million gallons per day reduction of demand - or about 12.5% of supply - for regional water system supplies by 2018. The EIR has identified the University has a goal of reducing water use by 20% by 2020.

**Response to Comment CCSF-24: SFPUC easements.**

The comment is noted. UCSF will consult the SFPUC on this matter.

**Response to Comment CCSF-25: SFPUC infrastructure.**

The comment is noted. UCSF will consult the SFPUC on this matter.

**Response to Comment CCSF-26: SFPUC easements.**

The comment is noted. UCSF will consult the SFPUC on this matter.

**Response to Comment CCSF-27: SFPUC easements.**

The comment is noted. UCSF will consult the SFPUC on this matter.
Response to Comment CCSF-28: Capacity of Block P15 pump station.
See Response to Comment CCSF-10 and CCSF-11.

Response to Comment CCSF-29: Capacity of Block P15 pump station.
See Response to Comment CCSF-10 and CCSF-11.

See Response to Comment CCSF-14.

Response to Comment CCSF-31: Flows to Mariposa pump station.
See Response to Comment CCSF-12.

Response to Comment CCSF-32: Flow capacity of Mariposa pump station.
See Response to Comment CCSF-12.
3.4.2 Campus Site-Specific Objectives

I. Parnassus Heights

F. Preserve the Mount Sutro Open Space Reserve as permanent open space, and serve as the steward of the Reserve by maintaining and expanding the trail system and by ensuring the safety of visitors and neighboring structures.

CD: WHILE THE EIR STATES THAT UCSF “SERVE AS THE STEWARD OF THE RESERVE” IT FAILS TO INCLUDE THE GOALS OF ITS OWN 2001 UCSF MOUNT SUTRO OPEN SPACE RESERVE MANAGEMENT PLAN BEYOND THOSE INCLUSIVE OF PUBLIC SAFETY. INSTEAD OF REAFFIRMING COMMITMENT TO THOSE GOALS A SUBSTITUTE PHRASE HAS BEEN INSERTED LATER IN THIS EIR:

4.3.2.2
“As of this writing, UCSF is carefully considering the public feedback received to date—responding to both previous forest management proposals and to the proposed fire hazard reduction measures presented in November, 2013—to determine the best path forward.”

HERE ARE THE 2001 MOUNT SUTRO MANAGEMENT PLAN GOALS WHICH WERE REACHED AFTER EXTENSIVE PUBLIC INPUT AND COLLECTIVE BARGAINING. THE GOALS IN RED HAVE BEEN ELIMINATED FROM THE 2014 LRDP EIR. THOSE REMAINING IN BLACK HAVE BEEN OR ARE BEING IMPLEMENTED.

Table 1: PCAT Planning Principles

Goal 1: Ensure Public Safety and Property Protection.
1.1 Eliminate and minimize tree and limb hazards to people, cars, buildings, and other structures within and immediately surrounding the Reserve.
1.2 Minimize fire hazards and reduce fuel accumulation.
1.3 Minimize runoff and soil erosion.
1.4 Minimize adverse impacts on the City’s adjacent watersheds and reservoir water quality.
1.5 Minimize windthrow potential.

Goal 2: Improve the Health of the Forest.
2.1 Protect and preserve existing healthy mature trees and tree stands, where needed and/or desirable (primarily by removing strangling vines), consistent with 2.3.
2.2 Improve regeneration, where desirable and as is feasible (primarily by thinning trees competing to survive and controlling invasive understory growth).
2.3 Increase the diversity of tree species and age throughout the Reserve, where desirable and suitable (primarily by removing eucalyptus trees and promoting forest regeneration in some areas AND replacing eucalyptus in other areas with more favorable species native to the Bay Area/extended environs).

Goal 3: Protect and Expand Native Plants.
3.1 Protect and preserve existing native plant communities to the extent practicable.
3.2 Restore native plant communities, where desirable and suitable.
Goal 4: Enhance Wildlife Habitat Values.
4.1 Preserve trees used for nesting by raptors and other special status wildlife species.
4.2 Preserve a sufficient number of dead and alive trees suitable for cavity nesting.
4.3 Expand native plant communities that provide food (e.g., non-invasive berry-producing species and oak), where desirable and suitable.
4.4 Remove invasive non-native understory vegetation; maintain some to provide cover, where appropriate.
4.5 Increase biodiversity in general with native species.
4.6 Create a greater number of small forest clearings and remove trees to allow sunlight to reach the understory, where beneficial and practicable.

Goal 5: Maintain Scenic Quality.
5.1 Maintain the overall forest character and visual backdrop of the hilltop Reserve.
5.2 Avoid noticeable, sudden reductions in the forest cover as seen from off-site.
5.3 Create small vistas of off-site features and forest openings, where desirable and practicable.

CD: DUE TO UCSF FAILING TO IMPLEMENT THE 2001 MANAGEMENT PLAN AND ADDRESSING THE RAPID DECLINE IN THE HEALTH OF THE FOREST, ENTIRE STANDS OF EUCALYPTUS ARE DYING. THE DECLINING HEALTH OF THE FOREST IS EASILY OBSERVED FROM SURROUNDING NEIGHBORHOODS. THUS THE GOAL OF MAINTAINING SCENIC QUALITY IS RAPIDLY BEING LOST.

6.1 Improve hiking trails (without impacting native plant species).
6.2 Protect important natural (e.g., rock outcrops) and cultural (e.g., Ishiís Cave) resources of public interest.
6.3 Minimize noise, lighting, parking, traffic, and other potential environmental impacts on nearby residents and employees and the Reserve itself.

7.1 Implement incrementally over 30-year period in response to resource management plan priorities and to natural changes caused by wind, insect infestation, fire, and other natural and unnatural events.
7.2 Provide adequate funding for implementation.
7.3 Develop collaborative partnerships with community groups, regional organizations, academic institutions, governmental agencies, and others willing to provide volunteer labor, materials, equipment, and funding for implementing and monitoring proposed actions, or to otherwise share resources and experience.
7.4 Promote public education about management goals and objectives (pamphlets, docent-led walks).

CD: WITH THE EXCEPTION OF THE WORK PERFORMED BY THE SUTRO STEWARDS, AN INDEPENDENT NON-PROFIT ENVIRONMENTAL STEWARDSHIP ORGANIZATION, UCSF HAS FAILED TO IMPLEMENT THE RESOURCE MANAGEMENT PLAN AND STEWARD ITS LAND AS STATED IN 2014 LRDP EIR 3.4.2 (F). WHILE UCSF DOES PROVIDE SUPPORT TO THE SUTRO STEWARDS PROGRAM, THE LIMITED FUNDING AND LACK OF A FINALIZED MOUNT SUTRO RESERVE EIR HAVE LIMITED THE SCOPE OF WORK POSSIBLE AND THE INABILITY TO SECURE GRANT ENVIRONMENTAL STEWARDSHIP GRANTS.
3.5.1 Land Use

3.5.1.1 Functional Zones

TABLE 3-1

Open Space 1

1 The area designated as Mount Sutro Open Space Reserve shall be kept free of any permanent structures or facilities except footpaths and appropriate landscape construction intended to enhance its use as a natural area.

The footnote includes the wording “and appropriate landscape construction intended to enhance its use as a natural area” without further definition.

CD: THE EIR NEEDS TO DEFINE THIS PHRASE AND STATE WHAT CONSTITUTES THE SCOPE OF “APPROPRIATE LANDSCAPE CONSTRUCTION”. WOULD ENHANCING THE USE OF A NATURAL AREA INCLUDE AN OBSERVATION PLATFORM FOR BIRD WATCHING? A SHADE STRUCTURE FOR GROWING PLANTS USED IN RESTORATION WORK? BENCHES PLACED AT SCENIC OBSERVATION AREAS?

3.8.1.2 Proposed Update to the 1976 Regents’ Resolution

UCSF proposes to ask the Regents to update the 1976 Regents' Resolution to:

• Modify the way space and population are monitored at the Parnassus Heights campus site by 1) excluding all housing from the calculation of space subject to the Parnassus Heights space ceiling, and 2) tying the average daily population goal for the Parnassus Heights campus site to population projections contained in the LRDP EIR, as it may be updated from time to time. Both of these proposed modifications are discussed further below.

With this change, the three older Aldea Housing buildings and University House, which together contain approximately 132,400 gsf, would be removed from the space ceiling calculation.

CD: AFTER OVER TWO DECADES OF AGREEMENTS BETWEEN CHANCELLORS, SENIOR VICE CHANCELLORS AND THE COMMUNITY, UCSF HAS CAST ASIDE AGREEMENTS WHICH BOUND THE UNIVERSITY TO ADHERE TO A LIMIT ON HOUSING WITHIN THE ALDEA SITE. THIS DECISION WAS NOT UNDERTAKEN THROUGH A PUBLIC PROCESS WITH WHICH THE UNIVERSITY CAME TO THE COMMUNITY AND ASKED TO RENEGOTIATE OR MODIFY THESE LONG STANDING AGREEMENTS, RATHER IT WAS A UNILATERAL INTERNAL DECISION MADE BY SENIOR STAFF. THE PUBLIC ONLY BECAME AWARE OF THIS UNIVERSITY DECISION UPON THE PUBLICATION OF THE DRAFT 2014 LRDP.

FURTHER, IN ADDITION TO THE ALDEA AGREEMENTS BECOMING VOID, ONE OF THE THREE ABOVE MENTIONED ALDEA BUILDINGS WAS ALSO PART OF THE FOLLOWING LEGALLY BINDING DOCUMENT WHICH WAS NOT MENTIONED OR INCLUDED IN THE 2014 LRDP OR EIR:

MITIGATED NEGATIVE DECLARATION
The Institute for Regeneration Medicine at UCSF

State Clearinghouse No. 2008022027
WITHIN THIS MITIGATED NEGATIVE DECLARATION DOCUMENT IS THE OUTLINE FOR SWAPPING LAND FOR CONSTRUCTION OF THE IRM BUILDING FROM THE UCSF OPEN SPACE RESERVE IN EXCHANGE FOR “BUILDINGS 4 AND 5 IN THE ALDEA SAN MIGUEL HOUSING ARE SCHEDULED FOR DEMOLITION, AND THEIR FOOTPRINTS AND APRONS TOTALING APPROXIMATELY 0.5 ACRE”.

THIS HAS BECOME A COMPLEX AND DIFFICULT SITUATION WHICH NEEDS TO BE SETTLED BEFORE THIS EIR CAN BE APPROVED. FAR TOO MUCH ENERGY HAS BEEN SPENT OVER A LONG PERIOD OF TIME BY COMMUNITY ORGANIZATIONS, MEMBERS OF THE UCSF COMMUNITY ADVISORY GROUP AND NEIGHBORS WHO NEGOTIATED AGREEMENTS WITH THE UNIVERSITY, FOR THIS TO NOW BE ABANDONED.

IF THE ALDEA BUILDING IS TO REMAIN AS HOUSING, THE LAND SWAP NEEDS TO BE COMPLETED USING ANOTHER PARCEL WHICH CAN PROVIDE BENEFIT TO THE COMMUNITY AS WAS THE ORIGINAL INTENT.

I AM SUBMITTING A PROPOSAL FOR ANOTHER SITE WHICH COULD PROVIDE EQUAL BENEFIT FOR THE EQUIVALENT SIZE OF THE FOOTPRINT AND APRON OF THE REMAINING ALDEA BUILDING. THIS EXCHANGE SITE IS LOCATED AT THE CURRENT WOODS LOT, 100 MEDICAL CENTER WAY.

Proposal for Sutro Nursery Seed Propagation Center
Submitted September 2014 by Craig Dawson, Executive Director, Sutro Stewards

Overview:
UCSF has supported the work of the Sutro Stewards program since its inception in 2006. Together, UCSF and Sutro Stewards have begun work to improve public access and habitat while engaging thousands of community volunteers. Within the UCSF Mount Sutro Open Space Reserve, the Sutro Stewards program provides over 5,000 hours of volunteer service every year, focusing on habitat restoration, trail construction and maintenance, and nursery work.

Over the last two years the Sutro Stewards program has expanded markedly. The program draws larger and larger numbers of volunteers to our weekday propagation and nursery program, and continues to attract significant numbers to the two monthly Saturday trails and habitat programs. In 2013-2014 our schedule increased to 72 regular events annually, not including a number of special events and guided tours. We have also expanded our scope, beyond stewardship, to include education. All volunteers are provided with an overview of the program’s stewardship goals (UCSF’s open space management goals) and the critical need for management of this public open space. We know that everyone who volunteers with the Sutro Stewards will walk away with the knowledge that the time they donate will become part of the solution for improving the conditions, supporting and enhancing wildlife and allowing safe public access to the 61-acre reserve.

Growing Needs:
Since 2006, the Sutro Stewards have managed to run the stewardship program from a parking lot, throughout the year, rain or shine, because we have had no alternative. We have held our steering committee meetings in basements, living rooms and in borrowed office space. When the Aldea Center was being designed and built, it had...
been our hope that we would have use of that facility for our work; but it has not worked out that way. The Aldea Center is not a suitable facility for 100dirty, sometimes muddy volunteers to gather in after a winter stewardship event. Even the one restroom is often inadequate to support the large group events, 75-100+ volunteers, which we hold quarterly. As the needed management of the Reserve draws closer to implementation with passage of an EIR, we believe there will be an increasing need to accommodate larger numbers of volunteers in a more appropriate setting. It appears that the Woods Lot might be able to serve this need.

Proposal for Sutro Nursery Seed Propagation Center:
The Woods Lot is one of the few places in the forest that has an area with flat level ground, capable of accommodating temporary structures needed for the continued growth of the environmental stewardship program, and to support the needs of disabled volunteers (unlike the Sutro Nursery, which is not an accessible site). We currently have a shipping container there, housing our equipment; and we host our Saturday volunteer events from the Woods Lot.

We would propose to work with the University to reorganize a portion of the Woods Lot, to create a space to accommodate volunteers along with some temporary structures. The goals of this reorganization are:
• Seed Propagation Center. This area would complement the existing Sutro Nursery and become the hub of volunteer activities.

• Indoor meeting location, accessible throughout the year, in all types of weather for disabled volunteers, children and seniors, for whom the current nursery site is unsuitable with its steep driveway and stairs.

• Year-round flexible space for environmental education which directly supports the goals and objectives of the Mount Sutro Open Space Reserve Management Plan.

• To establish the Center at a location which will serve current needs yet afford the flexibility needed as future management of the Mount Sutro Open Space Reserve moves forward.

The uses we propose will displace some of the existing parking spaces, but with the planned removal of the Woods, Surge, and EH&S buildings, there is likely a solution that would not diminish the overall parking on campus.

The Woods Lot site is outside of the Mount Sutro Open Space Reserve boundaries; and will create no additional impact to the Parnassus space ceiling, with the use of pre-fabricated temporary structures. Critically, it will enable an expanding environmental stewardship program, which brings continued benefit to UCSF and the greater community, through Forest Stewardship, Environmental Education, Community Engagement, and Training for Stewards serving Mount Sutro and other San Francisco communities.
3.8.1.5 2014 LRDP Proposals at the Parnassus Heights Campus Site
The following proposals fulfill the 2014 LRDP site-specific objectives at the Parnassus Heights campus site:

**Open Space**
Continue to manage the Mount Sutro Open Space Reserve as permanent open space, and create new/restored trails. To enhance and improve access throughout the Reserve for the enjoyment of visitors three new trails are proposed in the Mount Sutro Reserve: 1) a trail on the north side of the Reserve connecting the Historic Trail to the campus, allowing for ease of access to/from the campus (Sunset Trail). This trail would begin near the Koret Vision Research building and connect with Medical Center Way before continuing to the Historic Trail; 2) a trail connecting the South Ridge and Quarry Road Trails to Christopher Drive, allowing for easier public access from the south side of the Reserve (Christopher Trail); and 3) an extension of this trail to Clarendon Avenue, which also would provide access to trails in the Interior Greenbelt (on City-owned land) located southeast of the Reserve (Clarendon Trail). The proposed trail alignments are approximate and have not yet been designed. Creating these new trails will require minimal vegetation removal, minor amounts of grading and new trail markers. (See Figure 3-10)

**Utilities and Other Infrastructure**
Construct retaining wall. Landslides have occurred along the northern slope of the Reserve just south of the Dolby Regeneration Medicine building. UCSF proposes to construct a retaining wall to shore up the hillside to prevent future landslides. Additionally, if it is determined that the Mechanical Annex at Parnassus Avenue and Medical Center Way is no longer needed, the building site would be reconfigured to allow for the widening of Medical Center Way. This action would facilitate better circulation, and ideally would be developed in conjunction with the New Hospital Addition.

CD: THE INCLUSION OF THE ABOVE PROPOSAL TO CONSTRUCT A RETAINING WALL ON MEDICAL CENTER WAY IS ANOTHER INSTANCE OF AN IDEA FOR WHICH THERE IS NO CORROBORATING MATERIAL PROVIDED. AS A FREQUENT USER OF MEDICAL CENTER WAY I AM UNABLE TO PICTURE WHERE THIS PROPOSAL WOULD TAKE PLACE AND TO WHAT EXTENT THE ROADWAY WOULD BE WIDENED OR ALTERED. THE ONLY LANDSLIDE AREA NEARBY WAS THE RESULT OF A LEAKING WATER TANK WHICH CAUSED SLOPE FAILURE DIRECTLY ACROSS FROM THE POWER PLANT. PRESENTING A DIAGRAM OF THIS PROPOSAL THERE CAN BE NO VALID COMMENTS, FEEDBACK OR DISCUSSION.

FURTHER THE PHRASE “This action would facilitate better circulation” LEAD ME TO SPECULATE WHETHER YOU ARE PROPOSING TO WIDEN MEDICAL CENTER WAY FROM PARNASSUS ALL THE WAY UP TO JOHNSTONE AND THUS CREATING A BETTER CIRCULATION FROM CLARENDON AVENUE. FOR MANY REASONS A PROJECT OF THIS MAGNITUDE WOULD BE UNACCEPTABLE.
3.9 Projects and Activities Not Included in the LRDP EIR

The following is a list of projects and activities that are not included in the LRDP EIR.

3.9.1 Parnassus Heights

3.9.1.1 Mount Sutro Management Project

Because this project is currently underway with its own environmental review, it is not included as part of the LRDP EIR.


THIS 2014 LRDP NEEDS TO INCLUDE THE FUNDING NECESSARY TO MITIGATE THE POTENTIAL HAZARD THAT THE RESERVE CURRENTLY PRESENTS, FUNDING FOR TREE THINNING IN OVERCROWDED AREAS, FUNDING FOR REPLANTING OF MORE DIVERSE TREE SPECIES AND FUNDING FOR INCREASED CONSERVATION ACTIVITIES AS OPPORTUNITIES PRESENT THEMSELVES AND THE EUCALYPTUS FOREST CONTINUES TO DIE OFF OPENING UP AREAS FOR CONVERSION PLANTING.

IF THE UNIVERSITY WISHES TO RETAIN OWNERSHIP OF THE RESERVE LANDS, THEN IT NEEDS TO BEGIN ITS CONSERVATION MANAGEMENT PROGRAM. TO CONTINUE THE PATTERN OF THE LAST SEVERAL DECADES IS SIMPLY NOT ACCEPTABLE.

ALTERNATELY THE UNIVERSITY SHOULD CONSIDER DEVELOPING A PARTNERSHIP WITH AN ENTITY WHO COULD MANAGE THE RESERVE AS ITS PRINCIPLE PROJECT. SUCH A PARTNERSHIP WOULD ALLOW THE UNIVERSITY TO FOCUS ON ITS CORE MISSION OF “ADVANCING HEALTH WORLDWIDE” WHILE THE MANAGEMENT RESPONSIBILITIES FOR THE MOUNT SUTRO OPEN SPACE RESERVE INCLUDING COMMUNITY EDUCATION, CONSERVATION, TRAILS MAINTENANCE AND SUPPLEMENTAL FUNDRAISING ARE UNDERTAKEN BY THE PARTNER.

A PARTNERSHIP COULD INCORPORATE A TEAM APPROACH UTILIZING PROVEN PRACTICES AND REGIONAL EXPERTISE TO SYSTEMATICALLY TACKLE AND RESOLVE ISSUES OF OVERALL FOREST HEALTH, PUBLIC SAFETY, AND WILDLIFE HABITAT COMBINED WITH ONGOING PUBLIC EDUCATION AND STEWARDSHIP EVENTS. ONE LOCAL MODEL WE COULD USE AS AN EXAMPLE IS THE PRESIDIO TRUST AND GOLDEN GATE NATIONAL PARKS CONSERVANCY, WHO ALREADY HAVE 15 YEARS OF EXPERIENCE AND PROVEN SUCCESS IN OPEN SPACE MANAGEMENT, CONTROLLING INVASIVE SPECIES, EXPANDING AND CREATING NEW WILDLIFE HABITAT, BUILDING SUPPORT THROUGH PUBLIC EDUCATION, AND IN THE PROCESS HAVE DEVELOPED MODEL PRACTICES WHICH COULD BE INCORPORATED IN THE RESERVE.

HOWEVER, NONE OF THIS CAN TAKE PLACE WITHOUT ANNUAL LONG-TERM BUDGETED FUNDING. IT IS THE FUNDING THAT SHOULD BE INCLUDED IN THE 2014 UCSF LRDP TO ADDRESS THE MANAGEMENT AND HAZARD REDUCTION MEASURES CONTAINED WITHIN THIS EIR.
4.3.2.2 Applicable Local Plans and Policies
This section discusses plans or policies developed by UCSF pertaining to biological resources. UCSF is not subject to local land use regulation whenever using land under its control in furtherance of its educational mission. However, it is UCSF policy to be generally consistent with applicable local regulations to the extent feasible. UCSF and City plans and regulations that are relevant to the biological resources impacts analysis are summarized below.

UCSF Mount Sutro Open Space Reserve Management Plan
During the development of the 1996 UCSF LRDP, the UCSF Community Advisory Group advised that the plan include recommendations for a maintenance and restoration program for the Mount Sutro Open Space Reserve’s vegetation and hiking trails. This management plan was developed in 2001 to provide a framework for protecting, enhancing, and restoring the Reserve while maintaining a balance between neighborhood and University interests. Seven planning principles inform the management plan and are listed, below.
- Ensure Public Safety and Property Protection
- Improve the Health of the Forest
- Protect and Expand Native Plants
- Enhance Wildlife Habitat Values
- Maintain Scenic Quality
- Improve Public Access
- Implement Resource Management Plan
The 2001 Management Plan continues to serve as a guide for maintenance and restoration of the Reserve.


WHAT THE UNIVERSITY HAS DONE TO DATE IS NOT CONSISTENT WITH APPLICABLE LOCAL PLANS AND POLICIES. IT HAS SIDESTEPPED THE REAL ISSUES SO AS NOT TO BECOME EMBROILED IN A DIFFICULT PUBLIC DEBATE, DURING WHICH TIME THE FOREST HAS SUFFERED ITS MOST SEVERE DECLINE IN OVER A CENTURY. THE RESULT DUE TO LACK OF MANAGEMENT ACTIONS HAVE INCREASED THE SEVERITY OF THE HAZARDOUS CONDITIONS THE 2001 PLAN WAS DESIGNED TO REDUCE.

THIS EIR SHOULD REQUIRE THE 2014 LRDP TO CONTAIN BOTH A FUNDING MECHANISM AND A TIMETABLE TO RESTART AND COMPLETE THE MOUNT SUTRO EIR AS WELL AS THE ACTIONS NEEDED TO EMBARK ON THE MANAGEMENT OF THE RESERVE.

4.7.1.8 Wildland Fire
The California Department of Forestry and Fire Protection has identified urban areas considered at risk as a fire-threatened community as part of the Wildland Urban Interface program. With California’s extensive urban Wildland-Urban Interface situation, the list of communities extends beyond just those adjacent to Federal lands. There are 874 communities currently on the Communities at Risk List, including San Francisco.
While all of California is subject to some degree of fire hazard, there are specific features that make certain areas more hazardous. The California Department of Forestry and Fire Protection (CAL FIRE) is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors (Public Resources Code 4201-4204 and Government Code 51175-89). CAL FIRE has developed a fuel ranking assessment methodology that assigns ranks (moderate, high, and very high) based on expected fire behavior for unique combinations of topography and vegetative fuels under a given severe weather condition (including wind speed, humidity, and temperature). In general, the susceptibility for high and very high wildfires dramatically increases in the late summer and early autumn as vegetation dries out, decreasing plant moisture content and increasing the ratio of dead fuel to living fuel (URS, 2008). Common causes of wildfires include arson and negligence. According to mapping for the City of San Francisco’s Hazard Mitigation Plan, only the Parnassus Heights campus site is located in an area considered to be a high to very high potential for wildfire (URS, 2008). This determination is based on expected fire behavior for unique combinations of topography and vegetative fuels under a given severe weather condition and is initially based on an assigned fuel model combined with topography. Final rankings are based on the amount of fuel present (URS, 2008).


THIS EIR SHOULD CONTAIN LONG RANGE GOALS OF HAZARD REDUCTION COUPLED WITH THE MOUNT SUTRO RESERVE MANAGEMENT PLANNING PRINCIPALS LISTED IN SECTION 4.3.2.2 OF THIS DOCUMENT. HAZARD REDUCTION WILL NOT BECOME PERMANENT AND SUSTAINABLE UNLESS IT IS COUPLED WITH STEPS TO IMPROVE FOREST HEALTH THROUGH DIVERSIFICATION AND REPLANTING OF THE MID AND UNDERSTORY WITH PLANT SPECIES WHICH CAN WITHSTAND DROUGHT AND THE POOR SOIL CONDITIONS FOUND ON MOUNT SUTRO. THERE ALSO NEEDS TO BE A FUNDING MECHANISM CONTAINED WITHIN THE 2014 LRDP FOR THIS WORK TO BEGIN AFTER THE COMPLETION OF THE MOUNT SUTRO EIR.

6.7.3 Hazards and Hazardous Materials – Parnassus Heights

Impacts and Mitigation Measures

Impact HAZ-PH-4: Implementation of the 2014 LRDP at the Parnassus Heights campus would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. (Less than Significant)

CD: WITHOUT LONG RANGE GOALS OF HAZARD REDUCTION COUPLED WITH LONG TERM COMMITMENTS INCLUDED WITHIN THE 2014 LRDP AND EIR TO IMPROVE FOREST HEALTH THROUGH DIVERSIFICATION AND REPLANTING, THE POTENTIAL FOR WILDLAND FIRES WILL REMAIN HIGH TO VERY HIGH. THIS CAN NOT BE CONSIDERED “LESS THAN SIGNIFICANT”.
IT IS ESSENTIAL THAT THIS 2014 LRDP AND EIR PLACE GREATER WEIGHT ON LONG-TERM SOLUTIONS THAT WILL PERMANENTLY REDUCE RISK WHILE ALSO SATISFYING THE PRINCIPALS OF THE RESERVE MANAGEMENT PLAN AS STATED WITHIN THIS DOCUMENT SECTION 4.3.2.2.

- Ensure Public Safety and Property Protection
- Improve the Health of the Forest
- Protect and Expand Native Plants
- Enhance Wildlife Habitat Values
- Maintain Scenic Quality
- Improve Public Access
- Implement Resource Management Plan

The 2001 Management Plan continues to serve as a guide for maintenance and restoration of the Reserve.

11 Alternatives
11.3.4 Alternative 4: No Demolition of Historical Resources

SHOULD THE DECISION BE REACHED THAT UCSF WILL NOT DEMOLISH THE SURGE BUILDING ON THE PARNASSUS CAMPUS DUE TO ITS HISTORIC STATUS, I WOULD ENCOURAGE EXPLORATION OF A CONCEPT WHICH MAY EXCLUDE IT FROM WITHIN THE PARNASSUS SPACE CEILING WHILE SAVING IT FROM DEMOLITION. IN SIMILAR FASHION, THE CROSS ON MOUNT DAVIDSON WAS SAVED BY ALLOWING THE LAND ON WHICH IT SITS TO BE EXCLUDED FROM THE SURROUNDING PARKLAND THROUGH LAND TRANSFER TO A NON-PROFIT ORGANIZATION WHICH INDEPENDENTLY RAISES FUNDING FOR MAINTAINING THE HISTORIC ASSET.

In 1997 0.38 acres (0.15 ha) of land, including the cross, was purchased for $26,000 by The Council of Armenian American Organizations of Northern California.

THIS CONCLUDES MY COMMENTS: CD
Response to Comment SUT-1: 2014 LRDP and management of Mount Sutro Open Space Reserve.

Thank you for your comments. As stated in the LRDP EIR (p. 3-62), the Mount Sutro Management Project is a separate project from the LRDP. The Mount Sutro Management Project was defined in 2010 following many community meetings, and a Draft EIR for the proposal was published in January 2013. Because separate environmental review for the Mount Sutro Management Project was already underway at the time the LRDP EIR was being prepared, the project was not included in the LRDP EIR. Accordingly, specific objectives relating to the Mount Sutro Management Project or to the 2001 UCSF Mount Sutro Open Space Reserve Management Plan are not and need not be included in the LRDP EIR. However, the LRDP does include new proposed trails in the Mount Sutro Open Space Reserve and the LRDP EIR analyzes the impacts of the new trails.

The LRDP objectives, both campus-wide and campus site-specific, are reported in the EIR (EIR pages 3-5 through 3-12) as they were written in the LRDP, as is appropriate, including the LRDP Parnassus Heights objective to “Preserve the Mount Sutro Open Space Reserve as permanent open space, and serve as the steward of the Reserve by maintaining and expanding the trail system and by ensuring the safety of visitors and neighboring structures.”

As discussed in the LRDP EIR (p. 3-62), UCSF is carefully considering public feedback received on the Mount Sutro Management Project, to determine the best path forward. Section 3.8.1.5 of the LRDP EIR does, however, explain that the LRDP contemplates the creation or restoration of three trails in the Mount Sutro Open Space Reserve; these are included as part of the LRDP’s activities, and the proposed trails’ environmental impacts are analyzed in Chapter 5 of the LRDP EIR. As noted above, the remainder of management activities in the Mount Sutro Open Space Reserve, including the goals for such management, form the subject of the currently pending Mount Sutro Management Project EIR.

Response to Comment SUT-2: Management of Mount Sutro Open Space Reserve.

This comment does not address the LRDP EIR’s analysis. As discussed in the response to SUT-1 above, UCSF is undertaking a separate CEQA process supported by its own EIR to consider management practices applicable to the Mount Sutro Open Space Reserve, wherein project objectives will be identified.

Response to Comment SUT-3: Management of Mount Sutro Open Space Reserve.

This comment does not address the LRDP EIR’s analysis. As discussed in the responses to SUT-1 and SUT-2 above, UCSF is undertaking a separate CEQA review process for the UCSF Mount Sutro Management Project. This process is ongoing and has not yet been completed by UCSF.
Response to Comment SUT-4: Mount Sutro Open Space Reserve.
This comment does not address the LRDP EIR’s analysis and does not identify a CEQA concern related to environmental impacts. There is no further written definition of “appropriate landscape construction intended to enhance its use as a natural area.” When proposals for physical changes within the Reserve are made, UCSF staff examines the particulars of the proposal to determine whether the spirit of the open space requirement is met.

Response to Comment SUT-5: Update to 1976 Regents’ Resolution.
This comment does not address the LRDP EIR’s analysis, and the concerns raised in the comment are not related to the analytical or procedural requirements of CEQA. The comment does not raise environmental issues. The LRDP’s proposal to modify the way space and population are monitored at the Parnassus Heights campus site was discussed at two community meetings on February 11, 2014 and June 18, 2014. The Reserve “land swap” referred to by the commenter is accounted for in the acreage calculation of the Reserve, and, with other LRDP proposals to demolish the Surge, Woods, and EH&S structures and return the footprint areas to the Reserve, the Reserve would remain at 61 acres (see LRDP pages 58-60). UCSF will consider the concept proposed by the Sutro Stewards to develop a nursery seed propagation center.

Response to Comment SUT-6: New trails in Mount Sutro Open Space Reserve.
Thank you for your comment.

Response to Comment SUT-7: Retaining wall.
The proposed retaining wall would be constructed just south of the Dolby Regeneration Medicine building, on the south side of Medical Center Way. Because plans are not yet available, the proposal is being analyzed in this EIR at a program level. When plans are developed, the project will be evaluated to determine what further environmental review is required under CEQA. With regard to the widening of Medical Center Way, widening may be proposed for the portion of Medical Center Way near Parnassus Avenue, alongside and in the vicinity of the site of the New Hospital Addition. To the extent any such road widening could cause environmental impacts, it would be studied in a future CEQA document evaluating the New Hospital Addition. There is no proposal to widen Medical Center Way all the way to Johnstone Drive.

Response to Comment SUT-8: Mount Sutro Open Space Reserve.
Thank you for your comments. These comments do not relate to the LRDP EIR, which examines the environmental impacts of UCSF’s plan for physical development; the LRDP itself is not a funding proposal. Please also see the response to SUT-1 above regarding the separate Mount Sutro Management Project EIR.

Response to Comment SUT-9: Mount Sutro Open Space Reserve.
Thank you for your comments. These comments do not relate to the LRDP EIR. As noted in the response to SUT-8 above, the LRDP is not a funding proposal, and CEQA does not require UCSF to include a funding mechanism or timetable for management activities in the Mount Sutro Open

13. Comments and Responses
Space Reserve; those activities (apart from new trail construction) are being evaluated in the separate Mount Sutro Management Project EIR, as explained in the response to SUT-1 above.

Response to Comment SUT-10: Mount Sutro Open Space Reserve.

Thank you for your comments. Please see the response to SUT-1 above, regarding LRDP objectives, which are distinct from the project-specific objectives of the UCSF Mount Sutro Management Project (a separate project from the LRDP that is undergoing separate CEQA review), and the 2001 Mount Sutro Open Space Reserve Management Plan objectives. Please also see the response to SUT-9 regarding a funding mechanism for activities in the Reserve.

Response to Comment SUT-11: Wildland fire.

As discussed in the response to SUT-1 above, UCSF is considering next steps for the Reserve under a separate planning and CEQA review process. The role of the EIR for the LRDP is to analyze the physical effects of the LRDP and LRDP proposals, and the Mount Sutro Management Project is not included in the LRDP as previously stated. The LRDP EIR examines only the impacts of the project as proposed (and its alternatives) and does not analyze the fire danger related to separate projects, such as the Mount Sutro Management Plan. Therefore, it is outside the scope of the LRDP EIR’s CEQA analysis to consider the likelihood of wildland fires within the Reserve and whether the impacts of any Reserve management actions on fire risk rank as less than significant or potentially significant. Nonetheless, UCSF understands and takes seriously the possibility of fires within the Reserve. Unrelated to the LRDP EIR process, last year UCSF worked with an urban forester and the San Francisco Fire Department to identify conditions in the Reserve that could pose a fire hazard, particularly given the severe drought in California (see LRDP EIR page 6-58). As a result, UCSF cleared vegetation in the Reserve near structures and roadways to reduce then-existing fire hazards, and it plans to continue to do so as a regular maintenance activity.

The LRDP EIR determined that LRDP activities would not substantially increase the population of the Parnassus Heights campus site, and would not increase the number of structures in the Reserve. In addition, UCSF is seeking to minimize the wildfire danger within the Reserve and has already completed some of the work. Therefore, the EIR concluded that the potential impact from exposure of persons or structures to a wildland fire attributable to the proposed LRDP would be less than significant (EIR page 6-58).

Response to Comment SUT-12: Surge building.

These comments do not relate to the LRDP EIR analysis and do not raise environmental issues. Thank you for your comments.
Transmitted via email to eir@planning.ucsf.edu

6.1.3 Aesthetics – Parnassus Heights Impacts and Mitigation Measures
UCSF has stated their intent to build up to 32 housing units at the site of the Proctor structure at 5th Ave and Kirkham. That is a remarkably exact number, however the LRDP suddenly becomes very vague with regards to the height of the future building. The height of this building will undoubtedly affect the Aesthetic character of everyone who lives in its shadow and loses sightlines of scenic Mount Sutro.

The residential housing across the street from the Proctor site is 1 or 2 story residential. The LRDP needs to specifically call out the height of a future structure on the Proctor site as an aesthetic impact. All future structures on the site of the Proctor building should have the exact same height (or less) than the existing Proctor structure.

6.14 Transportation
On 6-87, a table is provided of traffic survey data that is from a study that was conducted of intersections around campus, include 5th Ave and Kirkham. However that study simply measures level of service without taking into account what level of service is appropriate to the surrounding community. A level of service of A may be perfectly fine for a busy arterial intersection such as Judah and 19th, but unacceptable for a residential intersection such as Fifth Ave and Kirkham.

Traffic counts and level of service should be presented with additional context showing whether or not an intersection is surrounded by one or two family homes, to provide context for how busy an intersection “should be”.

In 6-99, it should be made clear that UCSF has committed to removing the two truck loading spaces attached to Koret when the building is demolished. This commitment, made by UCSF previously, is not shown here.

6.14.3.3 Operational Impacts

This section, or an appropriate one, should include the following mitigations for impacts on the neighborhood:

Discourage rogue car parking by student residents. Because new parking spaces are neither being allocated or built for new housing, UCSF will request SF MTA not to issue neighborhood J stickers for all addresses containing new student housing. This will encourage transit and
respect the neighbors who already fight for scarce parking spaces with UCSF patients, staff, and healthcare professionals.

**Design parking into faculty housing.** Because faculty are often accompanied by young families, it seems unlikely they will survive without a car even in transit-friendly San Francisco. UCSF will design faculty housing around Parnassus campus that includes parking, like much of the existing neighborhood housing stock does.

**Implement traffic calming at 5th Ave and Kirkham.** To reduce congestion at the residential intersection of 5th Avenue and Kirkham St due to the child care center and the increased contractor truck traffic accessible only by this intersection, UCSF proposes to implement and fund traffic calming measures previously presented to the 5th and Kirkham community. The design of these measures has already been successfully designed in collaboration with the community, reviewed by SF MTA, and tested for truck-turning by SF FD. It has the support of adjacent neighbors, SF MTA, UCSF, and the offices of both Supervisors whose districts straddle this intersection.

**Use of playground on weekends by neighborhood:** As a benefit to the neighborhood, we will make the outdoor playground being built at the Kirkham Childcare Center available to neighborhood children on weekends when the childcare center is otherwise closed.
“UCSF Neighbors”
October 9, 2014

Response to Comment NEI-1: Aesthetics, housing at Parnassus Heights campus site.

As noted on page 3-33 of the Draft EIR, the Proctor site may be developed with housing or instead it may be left as open space. If a building is constructed at the Proctor site, it is not proposed to exceed the City’s height limit for this area of 40 feet, which would be generally consistent with surrounding buildings, many of which are three stories tall. Potential aesthetic effects of this potential building are discussed under Impact AES-PH-2 on page 6-8 of the Draft EIR. This building has not yet been designed, but it would be constructed in accordance with the University’s Physical Design Framework and Facilities Design Guidelines and with the 2014 LRDP’s Community Planning Principles regarding Building and Public Realm Design.

Response to Comment NEI-2: Transportation, LOS at Parnassus Heights campus site.

The proposed LRDP was assessed against the significance standards (Section 4.14.3) for Transportation and Traffic as found on pages 4-146 to 4-148 of the UCSF LRDP EIR. As the commenter notes, one of these standards relates to the intersection level of service methodology, a measure of average vehicle delay at both signalized and unsignalized intersections. This methodology is traditionally used in CEQA analysis of traffic impacts but is not meant to be specifically tailored to account for the surroundings of the intersection being analyzed.

Response to Comment NEI-3: Transportation, neighborhood context at Parnassus Heights campus site.

The commenter requests additional discussion of context and ‘busy-ness’ of the setting, which can be interpreted as proxies for safety. The significance standards include significant impact language for actions resulting in substantial conflicts among autos, bicycles, pedestrians, and transit vehicles. The proposed project was not found to contribute to an increase in these conflicts at the Parnassus Heights campus site, and no significant impact would occur. (See discussion of Impact TRAF-PH-4 on page 6-98.) Additionally, with respect to the intersection of Fifth Avenue and Kirkham Street to which this comment specifically refers, the LRDP EIR’s traffic analysis found no noticeable impact on the level of service at that intersection as a result of the project (see Table 6.14-2); in other words, future conditions would remain similar to present conditions.

Response to Comment NEI-4: Transportation, loading zones at Parnassus Heights campus site.

As the commenter notes, the proposed demolition of the Koret building would include the removal of the two adjoining loading spaces. The LRDP EIR does not delve into specific details about which loading docks would be constructed and which would be removed. The LRDP EIR instead examines the total number of loading spaces on the entire campus site (existing and projected), and has determined that, based on anticipated demand, the number of loading spaces...
would be sufficient for the anticipated build-out of the LRDP. Thus UCSF anticipates no significant impact to loading demand as a result of the LRDP.

**Response to Comment NEI-5: Suggested mitigation measures at Parnassus Heights campus site.**

The commenter suggests ‘mitigation measures’ for parking impacts that were not found to be significant as part of the LRDP EIR, and CEQA does not require mitigation for less than significant impacts. UCSF has been in communication with the Parnassus Heights neighbors as part of the LRDP process, including discussing the content of the commenter’s suggestion. Although not required as part of the CEQA process due to the finding of no significance for transportation topics at the Parnassus Heights campus site, UCSF is committed to a continued dialogue with the community to address community concerns as they relate to transportation and traffic.

The commenter also suggests traffic calming as a mitigation measure for neighborhood impacts. However, as explained in the response to NE-2 and NE-3, the LRDP EIR does analyze the expected impacts of LRDP implementation on traffic congestion and safety concerns around the Parnassus Heights campus site, including the intersection of Fifth Avenue and Kirkham Street, and the LRDP EIR found these impacts to be less than significant. Thus, CEQA does not require mitigation for these impacts. However, in response to community feedback, two new LRDP proposals for the Parnassus Heights campus site have been added to the LRDP: to consider impacts on neighborhood street parking when developing new housing, and to facilitate traffic-calming measures at the intersection of Kirkham Street and Fifth Avenue (see page 3-37 of the EIR).

Regarding the commenter’s suggestion that a mitigation measure be included to allow the neighborhood to use the Kirkham Childcare Center playground, the comment is noted. As the comment does not address a significant environmental impact, no mitigation measures are required.
Greetings LRDP Planning!

I have just reviewed the general plans for Parnassus.

My biggest concerns are noise, lights and traffic from the UCSF Parnassus campus. Please make a commitment to reduce lights, noise and traffic emanating from the campus.

One particularly irksome development is the large number of very noisy, very large diesel buses that traverse through the neighborhood, to and from the campus. These buses are inappropriate. They use neighborhood streets several times an hour, making a huge amount of noise. Oftentimes, during the day, they are totally empty or perhaps with only one or two passengers. Having different campuses is great. Making student, staff and faculty travel from one campus to the other during the day in a normal work day is just a nuisance. Please realize that these buses, while they may be "better" than cars are no better than cars if they ferry no one or if they facilitate senseless requirements for student, faculty and staff to go around to different campuses during the course of a day's work. They are also very inappropriate in the amount of noise they create in our neighborhood.

Can you direct me to where in the LRDP this topic is discussed?

Thank you,

Pinky Kushner
1362 6th Avenue
San Francisco, CA  94122
Response to Comment PK-1: Noise, lights, traffic at Parnassus Heights campus site.

The Draft EIR includes specific mitigation measures to reduce the adverse effects of lights, noise, and traffic on the Parnassus Heights campus site. These measures are referenced in the Aesthetics, Noise, and Transportation sections of Chapter 6, Parnassus Heights Campus Site – Setting, Impacts and Mitigation Measures. The specific mitigation measures are listed in Chapter 5, 2014 LRDP – Impacts and Mitigation Measures, and include Mitigation Measure AES-LRDP-1 (nighttime construction) on page 5-11, AES-LRDP-2 (light and glare) on page 5-12, NOI-LRDP-1a (construction noise) on page 5-63, NOI-LRDP-1b (construction hours) on page 5-64, NOI-LRDP-2 (pile-driving) on page 5-65, and TRAF-LRDP-1 (construction traffic).

Response to Comment PK-2: Transportation, noise, shuttles at Parnassus Heights campus site.

Inherent in operating a multi-site campus is the need to transport persons between campus sites. Physicians, health care workers, academicians, and other staff often travel between sites to carry out their job duties. Students travel between sites for learning, and patients may need to receive health care at various clinical sites. The UCSF Shuttle system provides a vital link between UCSF’s various locations in San Francisco, and transports about 2.3 million passengers per year.

There are times during the day when some shuttles have relatively few riders. Unfortunately, these times are difficult to anticipate; at any given time, a UCSF shuttle may operate at or near capacity. Such fluctuations in demand are difficult to forecast. In order for UCSF shuttles to be a viable alternative to driving alone, the service must be reliable and frequent throughout the day. The City conducted a survey of UCSF shuttle riders that revealed UCSF shuttles replace over 2,700 single occupant vehicles in San Francisco each day.

Existing and projected shuttle trips were included in the EIR’s analysis of traffic, air quality, and noise impacts. UCSF shuttle fleet vehicles are regularly replaced and have the most modern emission controls. UCSF’s larger shuttle buses run on clean diesel, which is as clean, and in many cases cleaner, than similar vehicles that operate on standard gas. Electric and hybrid technology buses are part of UCSF’s longer term transportation sustainability strategy.

The existing and 2014 LRDP noise levels discussed in the Draft EIR include noise from existing and proposed UCSF shuttles. As described under Impact NOI-PH-4 beginning on page 6-76 of the Draft EIR, a project would be considered to generate a significant impact if it resulted in a permanent increase in ambient noise levels greater than 3 dBA in the project vicinity above levels existing without the project for areas already impacted by noise. Table 6.10-5 on page 6-78 demonstrates that the increase in traffic noise, including the noise from the shuttles, in the vicinity of the Parnassus Heights campus site during Existing plus LRDP and Cumulative plus LRDP conditions would not exceed 3 dBA at all measured roadway segments, resulting in a less than significant impact.
COMMENT FORM

Diane Wong
UCSF Campus Planning
654 Minnesota Street, 2nd Floor
San Francisco, CA 94143-0286

Dear Ms. Wong:

I wish to make the following comment(s) regarding the Draft Environmental Impact Report (Draft EIR) for the UCSF 2014 Long Range Development Plan:

1) Shuttle stops in front of ACE, 400 Parnassus Ave, should be restored.

2) A ramp is needed in front of 1500 Owens.

3) The Warriors arena should not be located at Mission Bay because it is not consistent with the rest of Mission Bay.

Sincerely,

Jackie Soehn
Response to Comment JS-1: Transportation, shuttle stops at Parnassus Heights campus site.

Thank you for your comment. The comment does not relate to the EIR analysis or raise environmental issues, but your request will be provided to UCSF Transportation Services.

Response to Comment JS-2: Pedestrian access at Mission Bay campus site.

The comment does not relate to the EIR analysis or raise environmental issues. The EIR authors are not aware of the need for a ramp, as the building entrances are at grade and accessible. UCSF leases space in the 1500 Owens Street building, and does not own the site and therefore is not directly responsible for improvements to the building in areas not being leased.

Response to Comment JS-3: Golden State Warriors arena project.

The commenter’s opinion regarding the potential location of the Golden State Warrior’s arena is noted but is not relevant to the analysis in the LRDP EIR and is not within the control of UCSF.
October 14, 2014

Ms. Diane Wong
UCSF Campus Planning
Box 0286
San Francisco, CA 94143-0286
Email: EIR@planning.ucsf.edu

Delivered Via Email

Dear Ms Wong:

Thank you for the opportunity to respond to the Environmental Impact Report for UCSF’s LRDP. Westlake Urban is an affiliate of Westlake Kirkham Heights, LLC, the property owner of the Kirkham Heights Apartments (KHA) at 1555 5th Avenue, and is submitting these comments on behalf of the property owner. Westlake Urban is planning to redevelop the site and will be submitting an application on October 15, 2014 for a Preliminary Project Assessment (PPA) to the City's Planning Department for a plan to replace the existing 86 existing apartment units with 460 new units. The City approval and entitlement process for this application is expected to be lengthy and will likely coincide with the timing of some of the projects included in UCSF’s LRDP.

**Westlake Comment Regarding Demolition:** *In the event UCSF decides to demolish Medical Research 4 or the Koret Vision Research Center, the demolition process should be coordinated with Westlake Urban to minimize impacts on the current and/or future KHA residents and the adjacent neighbors.*

**Westlake Comment Regarding Proctor Building and UC Hall:** *In the event that the Proctor Building and/or UC Hall are demolished, Westlake Urban requests that the EIR address impacts related to the demolition, reuse or redevelopment of these buildings to ensure that impacts are minimized on the current and/or future residents of the Westlake property and the adjacent neighbors.*

**Westlake Comment Regarding Mount Sutro Reserve New Trail:** Westlake supports the construction of a new trail in the vicinity of the proposed Sunset Trail and requests coordination with Westlake Urban’s planned redevelopment of the Kirkham Heights Apartments, which may include connection of the property to the Sutro Open Space Reserve and trail network through
stairways and a new trail on Westlake’s private property.

**Westlake Comment Regarding Utilities and Other Infrastructure:** Westlake supports replacement of the gas and fuel storage tanks in the vicinity of Medical Center Way and requests coordination with Westlake Urban’s planned redevelopment of the Kirkham Heights Apartments during the planning for the relocation and expansion of the utility lines and the replacement. In addition, Westlake requests adequate notification about the potential closure of Medical Center Way for several months if required for the replacement of underground diesel fuel storage tanks to minimize impacts on the current or future KHA residents and the adjacent neighbors.

**Westlake Comment on Overhead Electrical Wires & Poles on Kirkham Avenue (in front of Kirkham Child Care Center).** For public safety and aesthetic reasons, Westlake requests that UCSF initiate the required actions with the City and County of San Francisco for installation of new street lights and poles (consistent with the neighborhood street light standards) to replace the existing overhead power lines and poles. These new streetlights would connect to the already existing underground trenches constructed during the mid-1990’s neighborhood-wide Inner Sunset Underground District. Westlake requests this action as part of UCSF’s overall enhanced pedestrian spine in the area of Medical Center Way and the planned improvements to the utilities and other infrastructure.

We appreciate the opportunity to participate in this important conversation regarding the long-range future of UCSF.

Sincerely,

Gaye C. Quinn
Managing Director
Westlake Urban, LLC
Westlake Urban
Gaye C. Quinn, October 14, 2014

Response to Comment WU-1: Westlake Urban redevelopment plans for Kirkham Heights Apartments.

Thank you for your comment. Overall effects of 2014 LRDP demolition proposals are discussed under the relevant environmental topic (e.g., Air Quality and Noise) in Chapter 5, 2014 LRDP Impacts and Mitigation Measures, and the specific effects at the Parnassus Heights campus site are discussed in Chapter 6, Parnassus Heights – Setting, Impacts and Mitigation Measures. UCSF will notify Westlake Urban and other community neighbors if UCSF decides to demolish buildings on the campus site.

Response to Comment WU-2: Proctor building and UC Hall.

See Response to Comment WU-1. To clarify, as noted on page 3-33 of the Draft EIR, the Proctor site may be developed with housing or instead it may be left as open space. UC Hall is not being proposed for demolition, rather it will be renovated for residential and office use in the short-term and residential use in the long-term.

Response to Comment WU-3: Mount Sutro Open Space Reserve trail.

UCSF will notify Westlake Urban and other community neighbors prior to constructing new trails in the Mount Sutro Open Space Reserve.

Response to Comment WU-4: Utilities and infrastructure.

UCSF will notify Westlake Urban and other community neighbors if UCSF decides to replace medical gas and diesel fuel storage tanks.

Response to Comment WU-5: Overhead electrical wires and poles along Kirkham Avenue.

Thank you for your comment. The comment does not relate to the EIR analysis and it does not raise any environmental issues. For informational purposes, in 1999 UCSF participated in the Inner Sunset Utility Undergrounding District. The University paid for the undergrounding of all overhead utilities to UCSF buildings on Kirkham Street. At that time, the City of San Francisco assumed responsibility to pay for removal of their old wooden poles and associated streetlights, and to replace them with new City streetlights as part of the Inner Sunset Utility Undergrounding project. UCSF does not propose pedestrian spine work on Medical Center Way or in the vicinity of the Kirkham Heights property, but UCSF can work with the commenter to contact the City to request that the City streetlight work on Kirkham Street be completed.
From: <tesw@aol.com>
Date: October 14, 2014 at 3:40:08 PM PDT
To: <BBlopez@CGR.ucsf.edu>
Subject: draft LRDP comments

Re UCSF LRDP Draft EIR
10-14-2014
To Whom It Concerns:

In general, UCSF is a good neighbor in San Francisco, and a good partner with the City and Bay Area as a health provider, jobs provider and more. I appreciate that a significant portion of the changes support a new state-mandated hospital at Parnassus.

Here are some specific comments on the all campus Draft EIR for the LRDP, with special emphasis on the Parnassus campus:

5.0.1 Adding 2.39 million gsf by 2035, 3.18 million gsf including a new hospital, and apparently 600 students and 11,000 employees, seems excessive, and needs more justification in our space-limited city.

5.0.2.3 The average daily population, currently about 39,420, is projected to increase to 56,420, about 17,000 additional persons.
At Parnassus, the current 17,950 daily population exceeds the 1996 LRDP agreements made by the Board of Regents of 16,000, and is planned to increase to some 18,600. So current daily population is roughly 10% over the last agreement, and is only projected to increase to roughly 15% over the daily population limit. UCSF promised to reduce both its footprint and daily population at Parnassus with the build out of Mission Bay, but the opposite has been the case, and is planned to continue to be the case.
Additional persons at Parnassus can have a substantial impact on neighborhood traffic, parking, and transit usage.

4. I congratulate UCSF for planning the return of Millberry Union towers to campus housing, though this is not planned until 2031, at the tail end of the LRDP.

5.2 Air Quality. I suggest that a series of actual surveys be done over adjacent neighborhoods over all three shifts and various days of the week to compare self-reports on driving, transit, etc. use with actual neighborhood impact. The results could then be linked to the Transportation section.

5.3 Biological Resources. Only three plants and three animals are cited. The Mount Sutro Reserve is so over-run with ivy and other non-native vegetation it is next to impossible to tell what is actually there, and is there in latent growth or roots and seeds. The condition of the Reserve has been deteriorating. Various tree diseases have been identified. Instead of a serious approach to addressing diseases and over-growth, trees and vegetation have been trimmed away from buildings and support facilites, then chipped and spread on site, further spreading disease and non-native seeds. Furthermore, prior agreements with the City of San Francisco regarding the stream, Sutro Creek?, running through both the Reserve and the Inner Green Belt have been abrogated by UCSF. Cross Reference: 5.8 Hydrology.

4. Cultural Resources. I look forward to announced dates for “UCSF shall install interpretive materials at or near the site to enhance public awareness in the form of a historical marker, kiosk, or other display that contains historical photos and text about the building’s historical significance” for the several buildings to be demolished or remodeled and Saunders Court.

Mount Sutro Reserve. I note that adding three trails appears to serve the purpose of increasing recreation and Open Space usage. I wish that the 2001 Mount Sutro Master Plan would be fully implemented.
5. Geology. I note the citing of potential liquefaction areas at Mission Bay requiring special study and construction methods. I did not see a reference to potential landslides on Parnassus and in Mount Sutro Reserve, and mitigations, other than a single retaining wall.

5.8 Hydrology. Prior agreements with the City of San Francisco regarding the stream, Sutro Creek?, running through both the Reserve and the Inner Green Belt have been abrogated by UCSF. Cross Reference: 5.3 Biological Resources.

9. Land Use and Planning. I appreciate the UCSF has, in general, in recent years made efforts to abide by City of San Francisco zoning. I acknowledge UCSF has noted that the new Parnassus Hospital and Mount Zion building would likely exceed San Francisco's limits. Of the two, I would put more weight on reducing the Mount Zion building to conform more closely with City zoning, as it is in the middle of dense housing and development, whereas the Hospital is offset by campus and Mount Sutro Reserve and is state-mandated.

I am concerned that services at Langley-Porter, planned for demolition, have not been described as being 100% replaced on campus.

I acknowledge that in deference to San Francisco zoning, UCSF plans to step back the Hospital south from Parnassus, to reduce height and bulk impact, similar to existing facilities.


The draft EIR states: “Assuming that future students and employees would make the same residential location decisions as current UCSF employees, approximately half of new students and employees would live in San Francisco. There would also be additional population living in those UCSF employee and student households. Assuming only one UCSF employee per household and based on 2.3 persons per household for San Francisco, the total population in San Francisco associated with UCSF growth under the 2014 LRDP would be about 13,000. The share of the City’s 2040 population growth associated with the population growth under the 2014 LRDP would be approximately 5%.”

I recently learned that a Resident at UCSF may earn $35-40,000/year. Since this salary would not allow an individual or family to rent market-rate housing without some other source of funds, I doubt that “about half” will continue to live in San Francisco, though this would be preferable. There will be more transportation impacts from non-local UCSF staff and students. Cross Reference: Transportation

I do support taking Aldea Housing out of the Space Ceiling, a fine logic that reduces the Space Ceiling overage to only 1.7%.

I wonder where Residents on call “sleep” now.


**Retaining Wall** I am not sure where to post this comment. The draft EIR states “Landslides have occurred along the northern slope of the Reserve just south of the Dolby Regeneration Medicine Building. Construction of a retaining wall at this location would stabilize the hillside to prevent future landslides. Vegetation removal and ground disturbance, as well as required excavation and the use of heavy equipment during construction of the retaining wall has the potential to adversely impact special-status plant and wildlife species within the project footprint and in surrounding habitat.”

This building was constructed on a very unsuitable site, and added to UCSF’s exceeding the Space Ceiling. The necessity of such a building in this location and on Parnassus was questionable, and leads to fears that other projects may somehow find similar necessity with poor judgment.

Tes Welborn  
Neighbor  
CAG member
Tes Welborn  
October 14, 2014

Response to Comment TW-1: Space and population growth.
The 2014 LRDP is UCSF’s plan to accommodate the growth projected to occur by 2035. The 2014 LRDP proposes to accommodate most of this growth in new buildings at the Mission Bay campus site, where there is undeveloped land available and infrastructure planned that will support such growth. At Parnassus Heights and Mount Zion, some existing buildings would need to be demolished to allow for new uses.

Between 2010 and 2040, San Francisco is expected to add about 191,000 new jobs, of which the UCSF share would be approximately 6%. The share of the City’s projected 2040 population growth associated with growth under the 2014 LRDP would be approximately 5%.

Although a major portion of the additional space needs would be accommodated in new buildings on campus sites or in new off-site leases, some of the need would be met through a combination of better utilization of existing vacant or underutilized space, consolidating functions or leases, and converting existing space to other uses to meet changing priorities.

Response to Comment TW-2: Average daily population.
As discussed in the LRDP EIR Project Description (page 3-26), the campus proposes an update to the 1976 Regents’ Resolution, which includes the proposal to tie the average daily population projections for the Parnassus Heights campus site to the then-current LRDP EIR, as updated from time to time and approved by the Regents. This would bring the proposed 2014 LRDP population projection to about 18,600 persons in year 2035.

Overall effects of the 2014 LRDP regarding traffic, parking, and transit usage are discussed in the Draft EIR in Section 5.14, Transportation and Traffic Impacts of the 2014 LRDP and specific effects of traffic, parking, and transit usage at the Parnassus Heights campus site are discussed in Section 6.14, Transportation and Traffic.

Response to Comment TW-3: Millberry Union towers.
Thank you for your comment.

Response to Comment TW-4: Air quality.
As noted under “Analysis Approach” on page 6-93 of the Draft EIR, vehicle, pedestrian, bicycle, and transit travel demand associated with the 2014 LRDP was estimated from surveys conducted at existing UCSF facilities over the past few years. Further information regarding the methodology and content of the surveys can be found in EIR Appendix G, Transportation Impact Study for the UCSF Long Range Development Plan. The data collected for the Transportation analysis is also used to inform the effects on Air Quality, as well as Noise, resulting from
implementation of the 2014 LRDP. UCSF completed these studies in accordance with applicable
and accepted protocols.

Response to Comment TW-5: Biological resources.
UCSF is currently studying the proposed management of the Mount Sutro Open Space Reserve.
This analysis is underway with its own environmental review and is not included as part of the
LRDP EIR, except with respect to three proposed trails in the Reserve, which the LRDP EIR
includes as a potential future project (see discussion on page 3-62 of the Draft EIR). Existing
conditions within the Reserve are discussed in some detail in Section 4.3, Biological Resources,
and effects of the 2014 LRDP on the Reserve are discussed in Section 6.3.

Response to Comment TW-6: Cultural resources.
Thank you for your comment.

Response to Comment TW-7: Mount Sutro Open Space Reserve.
Thank you for your comment.
See also Response to Comment TW-5.

Response to Comment TW-8: Geology.
Landslide hazards at the Parnassus Heights campus site are discussed in Section 4.5.1.2, Geologic
Hazards on page 4-53; Section 4.5.1.4, Seismic Hazards on page 4-59; and Section 6.5.3,
Geology, Soils and Seismicity—Parnassus Heights Impacts and Mitigation Measures of the Draft
EIR.

Response to Comment TW-9: Hydrology.
Thank you for your comment.
See also Response to Comment TW-5.

Response to Comment TW-10: Land use and planning.
Thank you for your comment.

Response to Comment TW-11: Replacing services at Langley Porter.
As noted in Table 5-1 on page 5-7 of the Draft EIR, the demolition of Langley Porter Psychiatric
Institute is not expected to occur prior to 2025. The future location of staff and services provided
at this location is undetermined at this time.

Response to Comment TW-12: Setback for New Hospital Addition.
Thank you for your comment.

Thank you for your comment. As noted on page 4-125 of the Draft EIR, the 2013 UCSF Transportation Commute Survey prepared in support of the 2014 LRDP indicates that over half of UCSF students and employees commute from San Francisco, and therefore likely reside in the City. The EIR analysis conservatively assumed that this ratio would continue through LRDP horizon in 2035. The transportation impacts are based on the growth assumptions of the LRDP and reflect the anticipated impacts. It is worthwhile to note that campus housing is typically offered at below market-rate and is only available to UCSF students, postdoctoral scholars, residents, and faculty/staff.

Response to Comment TW-14: Retaining wall and landslides.

Because landslides are possible, the retaining wall is needed to stabilize the hillside. The suitability of a particular site for a building already constructed and the relationship between that building and UCSF’s space ceiling are not issues relevant to the CEQA analysis for the LRDP.
UCSF Parnassus Heights Campus
Millberry Union Conference Center
500 Parnassus Avenue
San Francisco, CA

UCSF Long Range Development Plan
Draft EIR Public Hearing

Monday, September 22, 2014
7:00 P.M.

Reported by
Kent Odell
APPEARANCES

Present:

Lori Yamauchi
Associate Vice Chancellor
UCSF Campus Planning
MS. YAMAUCHI: Good evening. My name is Lori Yamauchi and I'm the Associate Vice Chancellor for Campus Planning for the University of California, San Francisco. I will be the Hearing Officer for tonight's public hearing on the Draft Environmental Impact Report, or Draft EIR, for the UCSF 2014 Long Range Development Plan, or 2014 LRDP.

The purpose of this hearing is to receive public testimony and evidence regarding the analysis of environmental impacts contained in the Draft EIR for the proposed 2014 LRDP, which was prepared pursuant to the California Environmental Quality Act, or CEQA. Tonight’s hearing is being conducted pursuant to the University of California’s procedures for the implementation of CEQA. Accordingly, this is not a community meeting regarding the 2014 LRDP itself.

Over the last two years, we have held many community meetings and workshops regarding the 2014 LRDP where we received comments about the proposal. The following meetings were held.

At Parnassus Heights, three community workshops on October 10, 2012; January 28, 2013; February 11, 2014. A community meeting on the Draft LRDP was held on June 18,
2014. An Aldea Housing community meeting was held on August 12, 2014.

At Mission Bay, two community workshops were held on October 25, 2012; February 28, 2013. A community meeting on the Draft LRDP was held at Mission Bay on June 16, 2014. LRDP Informational Presentation was given to the Mission Bay Citizens Advisory Committee, July 10, 2014.

At Mount Zion, a community workshop was held on April 25, 2013.

At Mission Center, a community workshop was held on April 8, 2013.

Two information presentations were given to the San Francisco Planning Commission on April 18, 2013, and September 18, 2014. An informational presentation to the San Francisco Commission on Community Investment and Infrastructure was given on August 20, 2013.

Public notice regarding this hearing and the availability of the Draft EIR included: mailed postcards to nearly 13,900 residences and businesses surrounding four UCSF campus sites: Parnassus, Mission Bay, Mount Zion and Mission Center; written notification to adjacent property owners; written notification to the San Francisco Planning Department’s neighborhood organization list; emailed notice to over 1,100 individuals and organizations on UCSF’s neighborhood listserv; advertisements in the San Francisco
Examiner, San Francisco Weekly, and Bay Guardian; posted notice on the UCSF LRDP website; posted notice on the UCSF website calendar.

Please note that this is not a typical UCSF community meeting. It is a formal public hearing, as recommended by CEQA, to receive public testimony regarding the Draft EIR, and thus will not be interactive. As required by CEQA, UCSF will respond to comments in writing and therefore will not respond verbally to testimony or engage in a dialogue with the public tonight.

There are speaker cards on the sign-in table that you may fill out if you wish to speak.

This hearing will be transcribed by a court reporter. A complete transcript of this proceeding, as well as all written comments received during the EIR public review period, will be included in and responded to writing in the Final EIR.

All comments will be presented to the decision maker, the Regents of the University of California, for review before considering the certification of the Final EIR. The decision-maker will then decide whether or not to approve the 2014 LRDP.

If you do not wish to speak tonight, you may submit written comments, which are given equal weight with oral remarks. Written comment forms are available on the
table if you would like to use them. You may also
supplement any oral testimony given tonight with additional
written material.

I would like to note that all comments must be
received by the close of the public review period on
Tuesday, October 14, 2014, at 5:00 p.m. in order to be
considered as part of the record. Correspondence should be
sent to Diane Wong, UCSF Campus Planning, 654 Minnesota
Street, San Francisco, California 94143-0286.

Regarding the hearing tonight, if you would like
to speak and have not already signed up, please fill out a
speaker card now and return it to the staff.

In order for your testimony to be accurately
recorded, and so that we may respond accurately in the Final
EIR, please come forward when called and use the microphone.
As you begin your remarks, please spell your name for the
reporter and indicate the name of any organization you
represent.

Again, UCSF staff will not respond to the
testimony this evening or engage in a dialogue with the
public; however, I will be happy to answer any procedural
questions about the hearing.

Are there any questions that have not been
addressed by my comments regarding the procedures tonight?

All right, then I will call on speakers. So are
there any speaker cards? No one wishes to speak?

FEMALE VOICE: (Inaudible)

MS. YAMAUCI: If there are no speakers, then I can close the hearing. So I want to make sure that no one here wishes to speak on the Draft EIR or offer any public comments? Okay.

If not, then I just wish to note that we will prepare written responses to all comments received in a comments and response chapter of the Final EIR. So if you wish to submit written comments, please include your name and contact information on your written comment card or on the sign-in sheet so that we can notify you when the Final EIR becomes available.

So unless there are any comments, this concludes the public hearing. Thank you, and good night.

-oOo-

[Public Hearing Adjourned.]
REPORTER’S CERTIFICATE

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were reported by me, a certified electronic court reporter and a disinterested person, and was under my supervision thereafter transcribed into typewriting.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 6th day of October 2014.

Kent Odell
CER**00548
TRANSCRIBER'S CERTIFICATE

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were transcribed by me, a certified transcriber and a disinterested person, and was under my supervision thereafter transcribed into typewriting.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 6th day of October, 2014.

[Signature]

Karen Cutler
Certified Transcriber
AAERT No. CET**D-723
13.3 Staff-Initiated Text Changes

The following changes to the text of the Draft EIR are made in response to comments on the DEIR or are included to clarify the DEIR text. In each change, new language is underlined, while deleted text is shown in strike through, except where the text is indicated as entirely new, in which case no underlining is used for easier reading.

Chapter 1, Introduction

The following text is modified in Section 1.2, Overview of the 2014 LRDP, on page 1-3:

Unlike other UC campuses, UCSF has no undergraduate students, but instead has a small population of graduate and professional students, clinical residents and postdoctoral scholars (6,310 4,760 in 2013: 3,080 students enrolled in degree programs and, 1,680 clinical residents, 1,100 postdoctoral scholars, and 450 clinical fellows).

The following text is modified in Section 1.2, Overview of the 2014 LRDP, on page 1-3:

UCSF is an urban institution with campus sites throughout the City of San Francisco and some locations beyond the city limits, comprising a total of approximately 202 201 acres, 61 of which make up the Mount Sutro Open Space Reserve at the Parnassus Heights campus site.

The following text is modified in Section 1.3, Project Background, on page 1-5:

Preparation of the LRDP has been a multi-year process which began in 2010. First, background data were collected and reviewed by a campus LRDP Oversight Committee and campus site-specific subcommittees comprised of a broad spectrum of campus representatives.

In addition to the guidance of the LRDP Oversight Committee and its topic-specific subcommittees, the 2014 LRDP was prepared with input from the UCSF Academic Senate, senior leadership, Faculty Councils of the Schools, the Graduate Division, a work group focusing on administrative space and many other groups and individuals.

The following is added to Table 1-1, 2014 LRDP Proposals, Program and Project Level Analyses, under “Circulation, Transportation and Parking”:

Parnassus Heights:
- Parnassus Avenue Streetscape Plan
- Parking and loading Improvements
- Traffic-calming measures
Chapter 2, Summary of Environmental Impacts and Mitigation Measures

Mitigation Measure AIR-LRDP-3: Off-Road Equipment Control Measures for NOx, on page 2-6, is modified as follows:

**AIR-LRDP-3: Off-Road Equipment Control Measures for NOx**

All off-road equipment greater than 25 hp and operating for more than 20 total hours over the duration of construction activities shall have engines that meet or exceed U.S. EPA Tier 3 off-road emission standards, meet the following requirements that will not be fully implemented via regulation until 2018 (i.e., the equipment is available for purchase or rental at present but its use not mandated throughout all fleets until 2018):

a. All off road equipment shall have:
   
   i. Engines that meet or exceed either U.S. EPA Tier 3 off-road emission standards, or
   
   ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).

Mitigation Measure UTIL-MB-1, on page 2-38, is revised as follows:

**Mitigation Measure UTIL-MB-1:** UCSF will monitor sanitary sewer flows to the P15 pump station in congruence with on-going monitoring conducted by the SFPUC. If the SFPUC determines that improvements are required to increase the capacity of the P15 pump station as a result of development within the pump station basin, including 2014 UCSF LRDP development at the Mission Bay campus site, UCSF will contribute its fair proportionate share to SFPUC for the potential required pump capacity improvements.

UCSF will monitor sanitary sewer flows to the Mariposa Pump Station in congruence with on-going monitoring conducted by the SFPUC. If the SFPUC determines that improvements are required to increase the capacity of the Mariposa Pump Station as a result of development within the pump station basin, including 2014 UCSF LRDP development at the Mission Bay campus site, UCSF will contribute its fair proportionate share to SFPUC for the potential required improvements.

Chapter 3, Project Description

The following figures have been revised and replaced in the Draft EIR. As noted below, some of the titles have also been revised:

Figure 3-1: UCSF Main Locations, on page 3-4.

Figure 3-7: Parnassus Heights-1996 LRDP Existing Functional Zones (as Amended), on page 3-28.
Figure 3-8: Parnassus Heights-Proposed Functional Zones, on page 3-29.

Figure 3-9: Parnassus Heights-Proposed Plan, on page 3-30.

Figure 3-12: Mission Bay-1996 LRDP Existing Functional Zones (as Amended), on page 3-41.

Figure 3-13: Mission Bay-Proposed Functional Zones, on page 3-42.

Figure 3-15: Mount Zion-Proposed Functional Zones, on page 3-49.

Figure 3-16: Mount Zion-Proposed Demolition, on page 3-51.

Figure 3-17: Mount Zion-Proposed Building, on page 3-52.

The following text is modified in Section 3.3, Campus and Context, on page 3-3:

UCSF is an urban institution with campus sites throughout the City and some locations beyond the city limits comprising a total of approximately 202.2 acres, 61 of which make up the Mount Sutro Open Space Reserve at the Parnassus Heights campus site.

The following text is modified in Section 3.4.1, Campus-Wide Objectives, 1.C, on page 3-5:

C. Design new buildings to be sensitive to the surrounding neighborhood and landscape, taking into account use, scale, potential noise generation, and density

The following is added to Table 3-1, Predominant and Secondary Uses in Functional Zones, under “Support”, on page 3-14:

- Offices
- Food services
- Retail
- Child care
- Recreation and fitness
- Conference space
- Library
- Police services
- Animal care
- Utilities
- Other Support Activities

The following text is modified in Section 3.6.2.1, Instruction, on page 3-16:

The proposed LRDP space program for instruction space is approximately 101,300-104,000 gsf over the existing amount of 607,500-608,000 gsf.

The following text is modified in Section 3.6.2.2, Research, on page 3-17:

The existing amount of research space is about 2.12 million 2,116,800 gsf.

The following text is modified in Section 3.6.2.3, Clinical, on page 3-17:
The existing amount of clinical space is about 1,952,000 gsf.

The following text is modified in Section 3.6.2.4, Support, on page 3-18:

The proposed LRDP support space program is projected to be about 710,400 gsf of new support space.

Table 3-2 on page 3-20 is modified as follows:

<table>
<thead>
<tr>
<th>Type of Space</th>
<th>Existing1,2 Total gsf</th>
<th>LRDP Horizon 2035 Total gsf</th>
</tr>
</thead>
<tbody>
<tr>
<td>Instruction</td>
<td>607,500</td>
<td>708,800</td>
</tr>
<tr>
<td>Research</td>
<td>2,116,800</td>
<td>3,068,300</td>
</tr>
<tr>
<td>Clinical</td>
<td>1,952,000</td>
<td>3,821,600</td>
</tr>
<tr>
<td>Support</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Academic Support</td>
<td>414,400</td>
<td>569,600</td>
</tr>
<tr>
<td>Academic/Campus Admin</td>
<td>1,487,000</td>
<td>1,790,800</td>
</tr>
<tr>
<td>Campus Community</td>
<td>385,600 385,000</td>
<td>474,300 473,700</td>
</tr>
<tr>
<td>Logistics</td>
<td>400,300</td>
<td>562,600</td>
</tr>
<tr>
<td><strong>Support Subtotal</strong></td>
<td>2,686,700 2,687,300</td>
<td>3,897,300 3,906,700</td>
</tr>
<tr>
<td>Housing</td>
<td>638,500</td>
<td>1,306,100</td>
</tr>
<tr>
<td>Vacant/Alteration</td>
<td>36,200</td>
<td>49,700</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>8,038,300</strong></td>
<td><strong>12,351,800 12,351,200</strong></td>
</tr>
</tbody>
</table>

1 Excluding 1,618,100 gsf of structured parking (653,700 gsf at Parnassus Heights; 176,500 gsf at Mount Zion; 680,500 gsf at Mission Bay; and 107,400 at Laurel Heights)
2 Total leased space assumed to be reduced by approximately 300,000 gsf from 1,049,000 gsf at LRDP horizon
3 Includes the 793,500 gsf Phase 2 Medical Center at Mission Bay.
4 Includes Mission Hall and the Phase 1 Medical Center at Mission Bay, both of which are currently under construction on the Mission Bay campus site.

The following text is modified in Section 3.8.1.1, 1976 Regents’ Resolution, on page 3-25:

Currently, Parnassus Heights contains approximately 3.845 million gsf of space, approximately 294,800 gsf or 8.3% above the space ceiling limit.

The following text is modified in Section 3.8.1.2, Proposed Update to the 1976 Regents’ Resolution, on page 3-26:

With this change, the three older Aldea Housing buildings and University House, which together contain approximately 132,400 gsf, would be removed from the space ceiling calculation.

The exclusion of all residential space from the space ceiling calculation, plus all of the physical proposals for the Parnassus Heights campus site described in the 2014 LRDP
and analyzed in this EIR, would decrease the amount of space subject to the space ceiling to approximately 3.61 million gsf by the LRDP horizon of 2035, or approximately 60,600 gsf (1.7%) above the 3.55 million gsf space ceiling limit.

The following text is modified in Section 3.8.1.5, 2014 LRDP Proposals at the Parnassus Heights Campus Site, on page 3-31:

   The two-story 6,100 gsf EHS building is located south and uphill of the Dolby Regeneration Medicine building across Medical Center Way on the northern edge of the Reserve.

The following text is modified in Section 3.8.1.5, 2014 LRDP Proposals at the Parnassus Heights Campus Site, on page 3-32:

   Built in 1917, UC Hall is one of the oldest buildings on the Parnassus Heights campus site. It is potentially eligible for the California Register of Historical Resources (CRHR) and the National Register of Historic Places (NRHP). This seven-story building is located on Parnassus Avenue, at the west end of the campus site, and constitutes approximately 148,200 gsf.

The following text is added in Section 3.8.1.5, 2014 LRDP Proposals at the Parnassus Heights Campus Site, on page 3-34:

   In response to community feedback, UCSF is exploring the possibility of locating a seed propagation nursery and a gathering space for trail maintenance volunteers in an area close to, but outside of, the Reserve.

The following text is added in Section 3.8.1.5, 2014 LRDP Proposals at the Parnassus Heights Campus Site, on page 3-37:

   Consider impacts on neighborhood street parking when developing new housing. When designing new campus housing, endeavor to minimize impacts on neighborhood street parking. For student housing where appropriate, consider working with the City to limit neighborhood parking permits for students. For faculty housing, design housing to include parking wherever possible.

   Facilitate traffic-calming measures at the intersection of Kirkham Street and Fifth Avenue. Neighbors near the Parnassus Heights campus site have expressed concern about on-going traffic issues, especially at the Kirkham Street and Fifth Avenue intersection. UCSF staff worked with neighbors to develop conceptual plans for pedestrian safety and traffic-calming improvements at this intersection, which would be funded by UCSF and implemented by the City.

The following text is modified in Section 3.8.2, Mission Bay, on page 3-37:
The 60.2 × 56.4 acre UCSF Mission Bay campus site is generally bounded by Mission Bay Boulevard South to the north, Owens Street to the west, Mariposa Street to the south and Illinois and Third Streets to the east.

The campus site comprises the original 42.3 acres north of Sixteenth Street (North Campus, formerly known as the Research Campus), and the 14.4 acres south of Sixteenth Street (South Campus) subsequently acquired for the Medical Center at Mission Bay, and the 3.8 acres east of Third Street (the East Campus) subsequently acquired for further campus development.

The following text is modified in Section 3.8.2, Mission Bay, on page 3-38:

Fourth Street and several private campus streets help disperse traffic, reinforce the urban pattern of the area, and provide view corridors. The East Campus is across Third Street, an important city street that connects Mission Bay to the South of Market and Bayview districts of San Francisco.

Of the 2.65 million gsf entitlement, 1.92 million gsf, representing 73% of the 1996 LRDP approved entitlement, has been built: six research buildings, a campus community center (known formally as the William J. Rutter Center, or simply as the Rutter Center) on Owens Street, and about 430 units of housing between Third and Fourth Streets. Research is currently the dominant use of space at Mission Bay.

The following text is modified in Section 3.8.2, Mission Bay, on page 3-39:

Mission Hall, an academic office building of 264,800 gsf at the northeast corner of Fourth and Sixteenth Streets, is expected to open in late 2014. Upon its completion, the total development on the North Campus will be approximately 2,192 million gsf, or about 82% of the existing allowable entitlement of 2.65 million gsf. Approximately 464,600 gsf of this entitlement will remain to accommodate substantial unmet academic needs that could benefit from a presence at Mission Bay.

Since the original Mission Bay campus site was envisioned, clinical programs have been introduced and an additional 14.4 acres of adjacent land (the South Campus) was acquired for the UCSF Medical Center at Mission Bay.

In summary, a total of approximately 1.134 million gsf is currently under construction at the Mission Bay campus site. When completed, there will be approximately 3 million gsf of UCSF-occupied space, excluding structured parking and the temporary child care center.

In December 2012, UCSF issued a Request for Qualifications to property owners and developers to identify opportunities for acquisition of a site for office use near UCSF’s Mission Bay campus site. In August 2014, UCSF acquired Mission Bay Blocks 33 and 34, a 3.8-acre parcel referred to as the East Campus, located directly across Third Street.
from the South Campus. The East Campus is projected to accommodate 500,000 gsf of development plus 500 parking spaces, and is expected to serve as a consolidation location for both owned and leased properties to reduce operating and occupancy costs, improve efficiency and collaboration and provide programmatic flexibility among its campus sites. UCSF is in advanced discussions to acquire Mission Bay Blocks 33 and 34, a 3.83-acre parcel directly across Third Street from the South Campus. UCSF hopes to complete the acquisition in the summer of 2014. Therefore, the potential further expansion of the Mission Bay campus site to include Blocks 33-34 is analyzed in this EIR.

The following text is modified in Section 3.8.2, Mission Bay, on pages 3-39 to 3-40:

Under the 2014 LRDP, the Mission Bay campus site boundaries would be expanded to include Blocks 33 and 34, which would be known as the East Campus. In connection with the pending acquisition of Blocks 33 and 34, UCSF entered a Memorandum of Understanding with the Successor Agency to the San Francisco Redevelopment Agency (also known as the Office of Community Investment and Infrastructure) regarding UCSF’s financial obligations, including contributions towards the construction of public infrastructure, affordable housing, maintenance of the open space system throughout Mission Bay, and agreement to follow the Mission Bay South Redevelopment Area Plan “Design for Development” regarding building height, bulk, setbacks, maximum tower floorplate and other design matters for buildings on the East Campus. UCSF also entered into an Infrastructure Agreement with the infrastructure developer for Mission Bay (FOCIL-MB, LLC) regarding UCSF’s contribution towards public infrastructure.

The following text is modified in Section 3.8.2.1, Proposed Functional Zones, on page 3-40:

When the locations of specific uses on the parcel are identified, the functional zones for the East Campus will be updated accordingly.

The following text is modified in Section 3.8.2.2, Proposed Plan, on page 3-43:

Development of the East Campus would accommodate 500,000 gsf. As a result, the total anticipated development through 2035 with the proposed expansion of the Mission Bay campus site (North, South, and East campuses) would be 5,135,200 gsf.

The following text is modified in Section 3.8.2.3, 2014 LRDP Proposals at the Mission Bay Campus Site, on page 3-43:

**Develop Additional Research Capacity (Blocks 16, 18A, 23A, and 25B).** Develop approximately 1,017,200 gsf of additional research capacity on Blocks 16, 18A, 23A, and 25B.

The following text is modified in Section 3.8.2.3, 2014 LRDP Proposals at the Mission Bay Campus Site, on page 3-46:
Expand the Mission Bay campus site to include Blocks 33 and 34 (East Campus).
UCSF has acquired Mission Bay Blocks 33 and 34, known as the East Campus. This area
The East Campus would be developed with is projected to accommodate up to 500,000
gsf and 500 parking spaces, and as part of the 2014 LRDP, the site would be functionally
zoned for research and parking use.

The following text is modified in Section 3.8.3, Mount Zion, on page 3-48:
Clinical uses are predominant on the campus site. UCSF owns buildings at Mount Zion
comprising 776 777,200 gsf and leases another 45,300 gsf of space within a quarter-mile
of the site, for a total of 822,400 821,500 gsf.

To support these programs, UCSF owns and operates three parking garages and several
surface parking areas totaling one parking lot with a total of 475 parking spaces.

The following text is modified in Section 3.8.3.2, Proposed Plan, on page 3-50:
The LRDP proposes to demolish the Hellman, Harold Brunn Institute, and Dialysis
Center buildings (totaling approximately 84,800 85,000 gsf) and construct a new
office/research building (see Figures 3-16 and 3-17). In addition, 2255 Post Street
(7,450 gsf) is also proposed for retrofit or demolition. The new office/research building
would be approximately 257,000 300 gsf; should 2255 Post Street be demolished, it
would result in a net increase at the Mount Zion campus site of about 164,850 gsf or
172,200 300 gsf if the building was to remain and be retrofitted. UCSF currently has no
plans to acquire additional property in the vicinity or expand the campus boundary.

The following text is modified in Section 3.8.3.3, 2014 LRDP Proposals at the Mount Zion
Campus Site, on page 3-50:
The Hellman and Brunn buildings are seismically compromised, and both of these
building, as well as the Dialysis Center building, are considered obsolete. The LRDP
proposes to demolish these three buildings, which total approximately 84,800 85,000 gsf.

The following text is modified in Section 3.8.4, Mission Center, on page 3-53:
The 3.1-three acre Mission Center campus site is located at 1855 Folsom Street on the
southern half of the block bounded by Fourteenth, Harrison, Fifteenth and Folsom streets.
The Mission Center campus site has only one building that is six stories tall and
constitutes approximately 290,900 291,700 gsf.

The following text is modified in Section 3.8.4.1, 2014 LRDP Proposals at the Mission Center
Campus Site, on page 3-54:
Construct a new office building and additional parking. For planning purposes, the
LRDP assumes that a new building would be no greater than the City’s height limit of
55 feet, which would allow for a four-story building up to 100,000 gsf. Therefore, it is
assumed that Mission Center would increase to 390,900 gsf from the current 290,900 gsf with implementation of the LRDP.

The following text is modified in Section 3.8.5.1, Laurel Heights, on page 3-54:

The 10.3-acre Laurel Heights campus site is located at 3333 California Street. The campus site is located on the block bounded by California, Presidio, Euclid, and Laurel streets. The main building is approximately 348,800 gsf with three below-grade floors and four above-grade floors. A one-story annex building with 14,000 gsf is located at the corner of California and Laurel Streets. There are 524 parking spaces on the site: 210 in the underground garage and 314 at the ground level, for a total of 541 surface parking spaces.

The following text is added in Section 3.8.5.1, Laurel Heights, on page 3-56:

If UCSF were to vacate the Laurel Heights campus site, relocation of the 1,200 employees there would likely occur in phases as programs are consolidated at other sites. Therefore, the 1,200 employees at the Laurel Heights campus site are included in the projected population of the 2014 LRDP at UCSF’s major campus sites at Parnassus Heights, Mission Bay, Mount Zion, and Mission Center, and the environmental impacts of projected UCSF population growth at those sites are evaluated in the 2014 LRDP EIR. If UCSF does elect to vacate, the relocation of population necessary to vacate the building will occur after the certification of the 2014 LRDP EIR.

The following text is modified in Section 3.8.5.4, Hunters Point, on page 3-57:

Because UCSF’s facilities on this site are in relatively poor condition, UCSF is exploring the relocation of those functions and occupants and potential relinquishment disposition of the site as part of the strategy to consolidate remote sites.

The following text is modified in Section 3.8.5.5, Oyster Point, on page 3-57:

The building constitutes approximately 144,400 gsf.

The following text is modified in Section 3.8.5.5, Oyster Point, on page 3-57:

Relocation of the functions at and subsequent disposition of Oyster Point is being considered as part of UCSF’s strategy to consolidate remote sites.

The following text is modified in Section 3.8.5.6, UCSF Fresno Center for Medical Education and Research, on page 3-58:

The UCSF Fresno Center for Medical Education and Research opened in 2004. The three-story, 84,200-gsf building sits on 3.1 acres.
The following text is modified in Section 3.8.5.7, San Francisco General Hospital, on page 3-58:

UCSF occupies approximately 261,900 gsf of research labs, office and clinic space on the SFGH campus in ten buildings (Buildings 1, 3, 5, 9, 10, 20, 30, 40, 80/90, and 100).

The following text is modified in Section 3.8.6, Leased Sites, on page 3-60:

As of April 2014, UCSF occupies a number of leases larger than 10,000 gsf within a quarter-mile of its main campus sites at Parnassus Heights, Mission Bay, and Mount Zion.

The following text is modified in Section 3.9.1.1, Mount Sutro Management Project, page 3-62:

Proposed trails are now being analyzed as part of proposed activities under the LRDP and are described in this EIR in Section 3.8.2.7.

Chapter 4, Regional Setting, Regulatory Considerations, Significance Standards and Analysis Methodology

The following text is modified in Section 4.6.2.3, Local Regulations, on page 4-81:

- Bay Area Bike Share station at Mission Bay (due to begin construction in late 2014), where members will have access to bicycles (and a regional network of stations) provided by the Bay Area Air Quality Management District (construction is dependent on the City’s ability to secure additional funding for the program)

Chapter 5, 2014 LRDP – Impacts and Mitigation Measures

The following is added to “2014 LRDP Circulation, Open Space, and Utilities/Infrastructure Proposals” on page 5-6:

2014 LRDP Circulation, Open Space, and Utilities/Infrastructure Proposals

- Parnassus Avenue Streetscape Plan (PH)
- Traffic-calming measures (PH)
- Saunders Court renovation (PH)
- Mount Sutro Open Space Reserve trails (PH)
- Medical gas storage tanks (PH)
- Diesel fuel storage tank replacement (PH)
- Retaining wall (PH)
- Block 15 pump station upgrade (MB)

The following text is modified in Section 5.2, Air Quality Impacts of the LRDP, on page 5-15:

- Bay Area Bike Share station at Mission Bay, where members would have access to bicycles (and a regional network of stations) provided by the Bay Area Air Quality District (construction is dependent on the City’s ability to secure additional funding for the program)
The following text is modified in Section 5.14, Transportation and Traffic Impacts of the 2014 LRDP, on page 5-77:

- Bay Area Bike Share station planned at Mission Bay, where members would have access to bicycles (and a regional network of stations) provided by the Bay Area Air Quality District (construction is dependent on the City’s ability to secure additional funding for the program)

Chapter 6, Parnassus Heights Campus Site – Setting, Impacts and Mitigation Measures

The following text is modified in Section 6.5.3, Geology, Soils and Seismicity, on page 6-49:

As a result, with implementation of these regulatory requirements any potential seismic impact including liquefaction, landslides and other related hazards would be less than significant.

Chapter 7, Mission Bay Campus Site – Setting, Impacts and Mitigation Measures

The following text is modified in Section 7.0.2, Space Program, on page 7-2:

The LRDP proposes an additional 2.39 million gsf in owned and leased buildings across all of UCSF’s sites through 2035.

Mitigation Measure UTIL-MB-1, on page 2-38, is revised as follows:

**Mitigation Measure UTIL-MB-1**: UCSF will monitor sanitary sewer flows to the P15 pump station in congruence with on-going monitoring conducted by the SFPUC. If the SFPUC determines that improvements are required to increase the capacity of the P15 pump station as a result of development within the pump station basin, including 2014 UCSF LRDP development at the Mission Bay campus site, UCSF will contribute its fair proportionate share to SFPUC for the potential required pump capacity improvements.

UCSF will monitor sanitary sewer flows to the Mariposa Pump Station in congruence with on-going monitoring conducted by the SFPUC. If the SFPUC determines that improvements are required to increase the capacity of the Mariposa Pump Station as a result of development within the pump station basin, including 2014 UCSF LRDP development at the Mission Bay campus site, UCSF will contribute its fair proportionate share to SFPUC for the potential required improvements.

Chapter 10, CEQA Statutory Sections

The heading above the last bulleted item in Section 10.1, Significant and Unavoidable Impacts, on page 10-2 is modified as follows:
2014 LRDP Proposals at the Mission Center Mount-Zion Campus Site

- Impact NOI-MC-2: Construction activities proposed under the 2014 LRDP at the Mission Center campus site would result in increases in ambient noise levels during pile-driving activities.

The following text is modified in Section 10.2.4.14, Transportation and Traffic, on page 10-14:

If UCSF demand for public transit service requires the construction of facilities that would cause physical impacts, UCSF would contribute its fair proportionate share towards the cost.

Chapter 11, Alternatives

The heading above the last bulleted item in Section 11.1, Significant and Unavoidable Impacts of the 2014 LRDP, on page 11-2 is modified as follows:

2014 LRDP Proposals at the Mission Center Mount-Zion Campus Site

- Impact NOI-MC-2: Construction activities proposed under the 2014 LRDP at the Mission Center campus site would result in increases in ambient noise levels during pile-driving activities.