APPENDIX B
EIR Scoping Comments
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October 22, 2013

Diane Wong
UCSF Campus Planning
654 Minnesota Street
San Francisco, CA 94143

Dear Ms. Wong:

Re: SCH 2013092047 UC Regents UCSF Long Range Development Plan - NOP

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings Engineering Section (RCES) is in receipt of the Notice of Preparation (NOP) from the State Clearinghouse for the proposed Regents of the University of California (UC) UCSF Long Range Development Plan project.

The project area is within the proximity of active railroad tracks. RCES recommends that the UC add language to the UCSF Long Range Development Plan, so that any future development adjacent to or near the railroad/light rail right-of-way (ROW) is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade crossings. This includes considering pedestrian circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad ROW.

If you have any questions in this matter, please contact me at (415) 703-1815, sm4@cpuc.ca.gov.

Sincerely,

Sia Mozaffari
Utilities Engineer
Rail Crossings Engineering Section
Safety and Enforcement Division

C: State Clearinghouse
For more information contact us at help@ucsfneighbors.com or Shabbir Imber Safdar (415 683 7526) or Eugene Salazar at santana1732@sbcglobal.net.

Introduction

Please find enclosed selected comments on the EIR study. At a high level, this is a summary of the detail commentary below:

- We strongly object to the way you characterize the 5th Ave and Kirkham St. traffic calming measures. You are portraying them as something done to address the neighbors concerns about UC Hall traffic. This is patently untrue.
- We are concerned that a lack of transparency in the calculation of gross square foot space and population at Parnassus means that you are computing it incorrectly and may be far over the space and population ceiling.
- You have omitted specifying the environmental impact for a number of projects that, when outlined in more detail, may have a significant impact.

If you have any followup questions to these comments, please feel to contact our community through me. Additionally, we would like to see you publish this study for comment one more time before beginning work on the LRDP EIR.

Sincerely,

/s/

Shabbir Imber Safdar
shabbir@ucsfneighbors.com
415-683-7526

Selected comments

2.7 Campus Site Location and Proposed Physical Development Plans

P. 19: Statement made without basis of fact: “The total population of Parnassus Heights is not expected to grow substantially over the life of the LRDP.”

Explanation:

This claim is not borne out by the facts presented or the history of the management of campus. Historically UCSF has failed to accurately estimate and manage Parnassus population, exceeding the population cap set by the UC Regents Resolution of 1976 every year since implementation. Additionally there are more housing units being built at Parnassus. Given the fact that every year they have remained under limitations that they have failed to meet, UCSF may not claim credibly that the population of the Parnassus campus will increase.
Suggested fixes:

1. Break out overall Parnassus population figures per day similar to page 17 Table 2
2. Give a figure to show what population is right now versus 2035 on each campus site as well.
3. Provide detailed explanation that explains why population control to date has been in direct violation of the UC Regents guidelines, and how population management will be different going forward.

**P.10:** Statement made that structural parking of 1.58 million gsf is going to be excluded from campus-wide calculations. This suggests Parnassus parking is being excluded from space ceilings counts in violation of the 1976 Regents resolution.

Because no clear breakdown of Parnassus campus space is provided, the use of parking square footage exclusions suggests a violation of the 1976 resolution.

1976 Regents Resolution established a limit of 3.55 million gsf at the Parnassus Heights campus. “The space ceiling includes all building space, including parking structures.....”

Suggested fixes:

A clear breakout and count of how the total space at Parnassus is calculated would address these concerns. Such a calculation would assure the neighbors that the space ceiling compliance is not being incorrectly calculated to exclude parking.

**p.22: cushioning actions for 5th and Kirkham St were promised previously**

This section clearly misstates why traffic calming was undertaken at 5th Ave and Kirkham St. When the childcare center was built at 5th Ave and Kirkham St, UCSF promised traffic calming to the neighbors to mollify them. This traffic calming was never built until UCSF saw an opportunity to claim that it addressed neighbors concerns for new traffic from the UC Hall renovation.

Traffic calming at 5th Ave and Kirkham St does not address neighborhood concerns for the 2013 LRDP. Do not publish these claims on behalf of the neighbors.

**p.24 -- Implement Parnassus Avenue Streetscape Plan**

Since Parnassus Avenue is a surface street maintained by City and County of San Francisco (CCSF) and used for two buslines, when will the CCSF managed (MUNI and SF Planning Commission) public comment and approval process start? Have the appropriate CCSF agencies been notified of changes to City streets? If so, which ones?
Environmental impact checklists

5.1 Aesthetics

Would the project have a substantial effect on a scenic vista?

For Parnassus project “Demolish 13 Existing Buildings”, it should be analyzed in the EIR.

Whether or not Mount Sutro is a scenic vista is not in doubt. However for 4 of the 5 Parnassus Heights projects, buildings will be demolished, possible parking facilities will be built requiring night time safety lighting. Additionally truck delivery bays are possible for some of these which can require structures as well.

Unless UCSF is prepared to go into sufficient detail to describe what will happen on each of these sites, the replacements must all be analyzed for their impact on the scenic vista in the EIR.

For Parnassus project “Renovate UC Hall”, it should be analyzed in the EIR.

It is impossible to tell whether or not the UC Hall renovation will impact the scenic vista. Choices of exterior materials can impact the appearance of Mt. Sutro. In addition UCSF has admitted that they don’t know all the details of the renovation. Factors discovered after the project has been taken to blueprints could reveal a need to change the view profile of the top or sides of the building, impact the scenic vista.

Unless UCSF is prepared to go into sufficient detail to describe what will happen in the UC Hall renovation now, it must be analyzed for impact on the scenic vista in the EIR.

Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area

For Parnassus project “Renovate UC Hall”, it should be analyzed in the EIR.

Because the specifics of the UC Hall renovation are not known, both the aesthetic requirements, as well as the safety needs of the building are not known. Changing legal and aesthetic standards could dictate lighting changes that impact the overall brightness of the surrounding area.

Exceed the LRDP EIR significance…or by increasing pedestrian level wind speeds above the hazard level set forth...

For Parnassus projects “Renovate UC Hall” and “Utilities, Retaining Wall”, it should be analyzed in the EIR.

The “wind tunnel” effect on Parnassus is a well known problem, admitted to by both neighborhood residents and UCSF staff in public meetings. UCSF’s inability to mitigate it has removed any credibility it might have in being able to claim that wind would not increase to the point of safety concerns.
To make the claim that wind impacts won't be a factor, UCSF should conduct proper wind studies. It is worth noting that UCSF Parnassus CAG member Kevin Hart specifically requested this in a recent community meeting regarding the demolition of 374 Parnassus. If UCSF won't take the suggestion of its own captive Community Advisory Group, then one wonders what use they serve besides checking the box for “community input”.

5.12 Noise

Would the project [impact] a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

For Parnassus projects “Demolish 13 existing buildings”, it should be analyzed in the EIR.

The demolition of these buildings is only part of the story. Many of these buildings are slated to be replaced with parking lots and truck bays. The ambient noise created by additional car and truck traffic will create additional noise as this demand hits the residential neighborhood around 5th Ave and Kirkham Street.

5.13 Population and Housing

Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example through extension of roads or other infrastructure)?

For Parnassus projects “Renovate UC Hall” and “Renovate Moffitt & Milberry Tower”, it should be analyzed in the EIR.

Perhaps this is simply a drafting error, but the UC Hall and Milberry tower project both create new housing. Each of these projects require a specific assessment of people impact attached to them. This is especially true because UCSF has never successfully been compliant with the space ceiling as set by the UC Regents Resolution of 1976, and adding new housing should not be allowed until they are.

5.16 Transportation and Traffic

This is not a recommended edits of the EIR study, but a requirements of the EIR itself.

EIR should contain detailed analysis about how UCSF will accommodate population growth at Parnassus, and manage neighborhood impact of additional cars. The EIR should address the following issues:

- No parking issues are mentioned in all these different approaches, there will be a resident increase of 560, there will be an increase of patient population at Parnassus of 84,000. Where will they park?
• Which new residential units will be eligible for neighborhood parking stickers? Or will they be prevented from getting them?
Public Comment: UCSF LRDP Document:

To: Diane Wong  
From: Michael Daly  
October 29th, 2013

Reference: Clarification Language added to define the intentions of the CEQA/EIR and LRDP process

An always present myth prevails during public participation in the LRDP phase, that myth was repeatedly pronounced at the October 28th public meeting on the Parnassus Campus. One speaker mentioned several times that a Plan cannot be accomplished without ‘Plans” developed during an architectural phase, which address design intentions of individual parcels.

In fact, the CEQA/EIR and LRDP milestones are always accomplished in master schedules well in advance of beginning architectural process, to enable it, not accomplish it. In order to improve this understanding of the process among all parties, I suggest three minor edits to your draft, as noted below. These would show up on page 3, page 11 and page 14. This comment is submitted as a good faith suggestion which would hopefully allow to you a generous level of efficient communication to the community participants attending your events. Specifically, it would allow event chairs such as Lori Yamauchi actual bullet points in the document text to point to if these questions come up from the floor.

Page 3:

prepare an EIR as required by Public Resources Code Section 21080.09 that will evaluate the environmental effects of growth under the proposed LRDP. The LRDP EIR will be a program EIR that will be used by the Board of Regents of the University of California (The Regents) to evaluate the environmental implications of adopting the proposed LRDP. Once certified, the EIR will also be used to tier subsequent environmental analyses for future UCSF development projects (CEQA Guidelines Section 15152). Proposed UCSF development projects would then be reviewed in light of the LRDP EIR to determine the appropriate level of additional environmental review before implementation.

The CEQA/EIR and LRDP processes are not intended to accomplish actual design of structures or their eventual occupancy, rather these intend to meet statutory requirements of all projects of this scale in ensuring due diligence in all project planning front ends. This is a policy process, not an architectural document.
Projected Need for Additional Space

UCSF’s projected need for additional space through the LRDP horizon of 2035 is 2.43 million gsf in addition to the buildings currently under construction. The amount of instruction, clinical, research and support space that is expected to be needed and can be financially supported through 2035 is described below. The breakdown of the types of space needed across all sites is presented and discussed by major space category.  *Actual design of this space will be accomplished in the future as specific needs emerge and can be clarified.*

The 2.76 million gsf of additional capacity under the LRDP exceeds the projected 2.43 million gsf need for additional space in order to allow for some degree of campus growth to meet needs that may not be foreseeable at this time, given the 20+ year horizon of the LRDP. This is explained in greater detail below under “Total Space at LRDP Buildout.”

Total Space at LRDP Buildout

As noted above, UCSF’s projected need for additional space through the LRDP horizon is 2.43 million gsf in addition to the 1.13 million gsf of building space currently under construction. The projects identified in the LRDP would provide up to 2.76 million gsf at LRDP buildout.

*The purpose of this LRDP is to budget and ensure sufficient space to accomplish goals stated here; actual designs are pending future information to be gathered in real time.*

Although a major portion of the projected space need would be accommodated in new buildings
on campus sites, some of it would be met through a combination of better utilization of existing
vacant or underutilized space, reinvestment in existing sites, converting existing space to other
uses to meet changing priorities (e.g., converting office space at the Parnassus Heights campus
site to housing and backfilling Moffitt Hospital after 2030 with hospital support and other uses),
or consolidating functions or leases.

Respectfully submitted,

Michael Daly
138 Laidley Street
San Francisco, CA 94131

“Michael Daly” <mdaly138@gmail.com>
Greetings,

I thank UCSF for the opportunity to comment on scoping for the EIR for UCSF's LRDP.

An EIR should study all reasonable project alternatives so that the decision-making bodies and the public have sufficient information to make the best choices for UCSF and the environment. Oftentimes a project selected includes parts from more than one alternative.

In addition to the current proposal the EIR should study an alternative where each campus is a complete entity, with its separate mission, along with its own support facilities such as housing. This alternative will greatly lessen the need for shuttling staff/students/faculty from one campus to another, thereby reducing the burden of traffic between these campuses on the citizens of San Francisco. The environmental burden of semi-independent foci should be compared to the present pattern, where UCSF vans and buses more people around San Francisco all day long.

There are three basic issues--noise, lights, and traffic.

NOISE

The EIR for the previous LRDP made a commitment to reduce noise coming from the Parnassus campus into the surrounding neighborhood. I request that existing noise be analyzed professionally and completely and that future noise from each campus be reduced. Noise reduction is an important mitigation that will make living next to a large campus more livable. Noise reduction is never easy, but can be accomplished.

LIGHTS

Lights are another source of pollution that reaches out into the community. With any changes proposed for each of the campuses, reduction in existing lights is an important mitigation for other changes. Exterior lights should be changed to comply with dark sky principles. Interior lights that bleed out through unshielded windows should be changed to remove this light trespass.

On the Parnassus campus, night light pollution is especially noticeable because of the prevalence of low clouds that spread the light far beyond its source. Three examples; 1) lights from the anatomy floor in the clinic building are frequently on all night, and with non-shaded windows, these lights spread far into the neighborhood; 2) Lights near the glass walls of HSW mostly but also HSE likewise spread out into the neighborhood; 3) light from the Parnassus campus flagpole that flies, 24-7, rain or shine, spreads far into the neighborhood, being as it is on top of the building. As far as the flag is concerned, I would suggest a flagpole in the front circle by Moffitt Hospital, which, being lower down, could be spot illuminated without the broad
spread of light.

While I am suggestion solutions or mitigations, light pollution should be studied in the EIR, with an emphasis on reducing existing light pollution.

TRAFFIC

Living in the Inner Sunset, I can state unequivocally that the Parnassus neighborhood is clearly impacted by the comings and goings of the up to 18,000 visitors daily to the campus. Something has to give. The congestion gets worse every year. Traffic must be studied in the EIR and reasonable, achievable goals identified to reduce this impact.

1) Traffic in the citywide and Bay Area or regional network must be studied. It is not enough to study merely one campus and its bordering streets. For the Parnassus campus, it is not sufficient to study Parnassus and Irving, and a few of the avenues. Rather the citywide and regional Bay Area network for trips to the Parnassus campus must be studied, with a commitment to reduce this traffic.

Traffic generated to and from the other campuses should likewise be studied on a citywide and a regional basis.

2) Vans and high capacity vehicles are often proposed to help traffic issues. These vehicles bring their own problems.

2a) No vans or high capacity vehicles on residential streets--these should only be on major thoroughfares. The EIR should study alternative routes that use arterial roadways and avoid neighborhood streets completely.

2b) UCSF has included large, high capacity bus-like vans that move back and forth on residential streets. These particular vans appear to be similar to huge trucks, bringing unreasonable noise and pollution into the neighborhood. The EIR should study replacements for these huge vans that are more environmentally sensitive.

2c) Vans and high capacity vehicles that move people, campus to campus, may themselves induce traffic trips. This possibility should be studied in the EIR and whether a reduction in daily shuttling can be accomplished. With modern computers providing face-to-face dialogue, there should be no need to move people from one campus to another, throughout the day. Riding around on a bus should be seen as a waste of staff time and money, an abuse of student time and that of the professional teaching staff. The means to reduce shuttling should be studied.

3) As traffic mitigation, housing should be built on each campus for those persons who work at that campus and specifically not be allowed to be used for workers at other UCSF campuses.
4) Higher parking fees should be studied as an ideal way to reduce driving and congestion, as shown in the rest of San Francisco. Parnassus and the Mission campus seem to have set the hourly rate appropriately. The "early bird" rate, an all day rate, is unreasonably low. The EIR should study the impact of higher daily and monthly parking fees on single car occupancy. The study should include a fee schedule such that the more times per week and per month that a driver parks at a UCSF garage, the higher the fee. Once a week or 4 times a month should be more expensive than the present all day fee, for instance, up to twice higher, but the daily use of a UCSF parking garage should be quite a bit higher than the 'few times' a week fee. Higher parking fees should be used to help pay for the cost of Muni passes described below.

5) The EIR should study better markings for pedestrians, including lighting embedded in the street pavement at critical pedestrian crossings at all UCSF campuses. UCSF pay to put embedded pavement lighting in because UCSF brings in the traffic and UCSF staff and student pedestrians are heavily impacted, along with city neighbors. All campuses should be studied. For the Inner Sunset, obvious locations for pavement-embedded surface lighting are 7th and Irving and 7th and Judah, 7th and Kirkham. The EIR should propose a pedestrian friendly design for the parking garage entrance/exit on Irving Street at Arguello.

6) A critical citywide mitigation for the insult of traffic concerns MUNI use. MUNI passes for everyone working or studying at UCSF should be studied in the EIR.

The issuance of MUNI passes to all UCSF daily workers, students, staff, teachers, perhaps with a small, required fee, for example $20/month may be the most effective mitigation for UCSF's traffic impacts. The EIR should study the beneficial effects, city and regionally wide, of MUNI passes for all, with data from the MTA, the police, and the daily workers. The EIR should study the benefit to MUNI of having passes for all UCSF persons.

Higher fees for campus parking can help offset the cost of MUNI passes. This increase in parking revenue should, however, NOT be expected to pay for the passes, merely to help pay for them. The cost to UCSF for these passes should be part of the mitigation to the city's neighborhoods for UCSF's continuing presence within the dense urban fabric of San Francisco. The University of San Francisco is an example where all students are issued MUNI passes, automatically upon enrollment. The example of how it is done at USF should be studied in the EIR and how a MUNI pass issuance for all can be applied to UCSF.

7) Parking spaces and garages serve as magnets to cause more cars to come. This phenomenon at UCSF should be studied in the EIR. In the Initial Study there are instances where it is stated that building teardowns or building modifications will be used to create more parking. In order to reduce traffic, no further parking should be provided by UCSF, at any of its campuses. The parking that exists on Mount
Sutro, near the Surge and the Woods buildings, should be eliminated and the space added to the Mt. Sutro Open Space Reserve, as mitigation to the near neighbors on Edgeware.

In coordinating both the EIR and the planning for the LRDP, the EIR should assess UCSF regionally, not locally. The plan and its EIR must consider citywide and Bay Area regional impacts. Especially with regards to traffic, but also with regard the impacts of noise and lights.

One final point, the Initial Study is very vague about what will happen to Moffitt Hospital. Will it change? What will it change to? Will a specific change mean an increase in traffic to the Parnassus site? While other projects on the Parnassus campus are described in a few or several sentences, there is very little indication as to what is proposed for Moffitt Hospital. This seems to be a hole in the IS.

Thank you again for this opportunity.

Pinky Kushner
1362 6th Avenue
San Francisco, CA 94122
415 731-9486
November 12, 2013

Ms. Diane Wong, Environmental Coordinator
UCSF Campus Planning
654 Minnesota Street
San Francisco, CA 94143-0286

Subject: Comment on Scope of Initial Study For UCSF Long Range Development Plan EIR

Dear Ms. Wong:

The written comments presented below confirm and make more complete my oral comments presented at the Scoping Meeting held on September 28, 2013 in the Millberry Union of the Parnassus Heights campus regarding the scope of the Initial Study prepared by UCSF.

Public comment on the Initial Study was invited by UCSF regarding the scope and content of the environmental issues that UCSF intends to address in the forthcoming Environmental Impact Report (EIR) being prepared by UCSF for the proposed UCSF 2014 Long Range Development Plan (LRDP). UCSF is preparing the EIR in order comply with state law, the California Environmental Quality Act (CEQA).

In summary, as described more specifically below, the most glaring deficiency in the scope of this Initial Study for the EIR of the proposed UCSF 2014 LRDP is the complete omission of a very significant issue -- the numerous past failures of UCSF to comply with the state law, California Environmental Quality Act (CEQA).

Since UCSF must comply with CEQA in preparing this Initial Study and in preparing the EIR for the 2014 LRDP, the omission of its past failures to comply with CEQA certainly is a most significant omission.

My comments regarding the scope and content of the environmental issues as described in the Initial Study that UCSF intends to address in the EIR being prepared for the 2014 LRDP are as follows:

1. Omission of UCSF past failures to comply with CEQA. In addressing UCSF’s preparation of the EIR for the proposed 2014 LRDP, the scope of the Initial Study includes on page 6 the action taken by UC Regents to adopt a resolution addressing the environmental effects of daily population, floor area of buildings, open space on Mount Sutro, etc. Likewise certainly the scope of the Initial Study also should include complete information in the EIR regarding the potential significant adverse environmental effects of the past failures of UCSF to comply with state environmental law, i.e. CEQA, which were corrected by community organizations initiating legal action and the courts and the UC Regents taking action for UCSF to comply with environmental laws and guidelines. An EIR would be incomplete if it omitted the significant potential adverse environmental impacts which the UC Regents and Courts required UCSF to address and comply with CEQA as described more specifically in the following legal actions initiated by San Francisco community organizations regarding UCSF CEQA violations.
   a. The violation of CEQA in connection with the EIR prepared for the expansion of Moffitt Hospital building.
   b. The violation of CEQA in connection with the EIR prepared for a new building for the Dental School.
   c. The violation of CEQA in connection with the EIR for the master plan for the Laurel Heights campus.

2. The Initial Study fails to present complete and accurate information regarding the 1976 Regents Resolution.
   a. Incorrect description of resolution. Footnote 2 on page 6 notes, “... Mount Sutro was designated as open space for a 25-year period by The Regents in 1975.” Incorrect. The Regent’s Resolution established 50 acres of open space on Mt. Sutro “in perpetuity” - not for 25 years.
   b. Omits significant information. Omitted the facts that the Regents enacted the resolution to:
i. Resolve a law suit regarding the violation of CEQA and lower court decision and injunction. Omission of any reference to the violation of the California Environmental Quality Act by UCSF in connection with the construction of the new building for the Dental School and the expansion of Moffitt Hospital and that the Regents enacted the Resolution to lift the injunction.

ii. To settle law suit Regents adopted policies. Significant information was omitted in the Initial Study to correctly inform the public that the policies - regarding Mt. Sutro open space, daily campus population, gross square foot space ceiling, Parnassus Heights campus boundaries, selling homes (previously seized by eminent domain) to private individuals, etc. - were adopted by the Regents in order to resolve the environmental law suit filed by the community organizations.

iii. The plaintiffs of law suit were community and environmental organizations. The Initial Study omits that UCSF was the defendant of a law suit filed by community and organizations which included as plaintiffs the Mount Sutro Defense Committee, Inner Sunset Action Committee, Sierra Club, and others.

3. The scope of the Initial Study should include the community actions taken to ameliorate potential significant adverse environmental impacts of UCSF actions to:
   a. Seize via eminent domain and demolish single family houses around the Parnassus Heights campus.
   b. Construct a massive new building for the Dental School at the Parnassus Heights campus.
   c. Establish biological warfare research facilities at the Laurel Heights campus and eliminated biological warfare research at this campus.

4. The scope of the Initial Study should include a description in specific terms of each of the past LRDP’s of UCSF describing also in specific terms each amendment made to each one of the past LRDP’s.

5. The scope of the Initial Study should include a review of the possible future sale of UCSF facilities especially the facilities at the Laurel Heights Campus.

In conclusion, the above information pertaining to the scope of the Initial Study and the preparation of the EIR for the proposed UCSF 2014 LRDP is required to more fully fulfill UCSF’s responsibility to prepare a full and complete EIR.

Yours truly,

John D. Bardis
Former Member of the San Francisco Board of Supervisors
Former President of the Inner Sunset Action Committee and Coalition for San Francisco Neighborhoods