

5.0 OTHER CEQA CONSIDERATIONS

A. PURPOSE

This section covers topics required by the California Environmental Quality Act (CEQA) Guidelines, as amended, including Growth Inducing Impacts, Unavoidable Significant Impacts, Significant Irreversible Impacts, and Effects Found Not To Be Significant.

Growth Inducing Impacts. Section 15126.2(d) requires discussion of the ways in which a project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Such a discussion should also include projects that would remove obstacles to population growth, and the characteristics of a project that may encourage and/or facilitate other activities that, either individually or cumulatively, could significantly affect the environment. CEQA emphasizes that growth in an area should not be considered beneficial, detrimental or of little significance. The purpose of this is to evaluate the growth-inducing potential and impact of the project.

Unavoidable Significant Impacts. Section 15126.2(b) requires discussion of any significant impacts that cannot be avoided if the project is implemented. The discussion is to include the identification of any significant impacts that can be mitigated, but not to a less than significant level.

Significant Irreversible Impacts. Section 15126.2(c) requires discussion of significant irreversible changes that would be caused by the proposed project. This discussion shall consider the use of nonrenewable resources and irretrievable commitments of resources, the commitment of future generations to similar uses, and damage from environmental accidents.

Effects Found Not To Be Significant. Section 15128 requires a brief statement of the reasons that various possible significant effects of a project have been determined not to be significant and are therefore not evaluated in the EIR.

B. GROWTH INDUCING IMPACTS

In general terms, a project may foster spatial, economic, or population growth in a geographic area if the project meets any of one of the criteria that are identified below.

- The project removes an impediment to growth (through e.g., the establishment of an essential public service, the provision of new access to an area, or a restrictive change in zoning or general plan land use designation).

- Economic expansion, population growth, or the construction of additional housing occurs in the surrounding environment in response to the project, either directly or indirectly (e.g., through changes in revenue base, employment expansion, etc.).
- Development or encroachment in an isolated or adjacent area of open space (being distinct from an “infill” type of project.)

Should a project meet any one of these criteria, the project can be considered growth inducing. An evaluation of the CCSF Master Plan vis-à-vis these growth-inducing criteria are provided below. The CEQA *Guidelines* also require that consideration be given to potential impacts on community service facilities resulting from increase in population. **Section 4.6, Public Services and Utilities**, of this EIR addresses potential impacts on community service facilities (e.g., police, fire, water, wastewater, etc.) resulting from the expected increases in students and faculty on the CCSF Main Campus (the campus itself does not house any students or employees).

It must be emphasized that the CEQA *Guidelines* require an EIR to “discuss the *ways*” [emphasis added] a project could be growth inducing and to “discuss the *characteristics* of some projects that *may* encourage...activities that could significantly affect the environment” [emphasis added]. However, the CEQA *Guidelines* do not require that an EIR predict (or speculate), specifically where such growth would occur, in what form it would occur, or when it would occur. The answers to such questions require speculation, which CEQA discourages (see CEQA *Guidelines* Section 15145).

B1. Removal of an Impediment to Growth

Growth in an area may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services (e.g., water service), and planning impediments may include restrictive zoning and/or general plan designations.

The Main Campus is located in a highly urbanized area. Existing area roadways (Ocean Avenue, Phelan Avenue, Judson Avenue, and I-280) provide access to the campus. Thus, the Master Plan would not induce growth due to the removal of barriers to access.

The Main Campus is already developed. The San Francisco Public Utilities Commission (SFPUC) and the San Francisco Public Works Department (SFPWD) currently provide water and wastewater services to the campus and the surrounding area. The proposed development would connect to existing water and wastewater lines in City streets. At the start of each individual project proposed under the Master Plan, CCSF would consult with the SFPUC and SFPWD to determine the specific infrastructure

improvements necessary to meet SFPUC and SFPWD requirements (e.g., fire flow requirements, water demand, water capacity, etc.). In addition, the San Francisco Fire Department (SFFD) would determine the fire flow requirements as a result of development and consult with the SFPUC regarding pipe size and capacity. Any infrastructure improvements would occur within the Main Campus boundaries and would not result in additional water or wastewater capacity lines within the City. Given the above, the Master Plan would not induce growth due to the extension of the water or wastewater infrastructure.

Additionally, approval of this project would not require an amendment to the San Francisco *General Plan* or changes to existing zoning. The campus is already designated in the *Institutional Facilities Plan* and is zoned for public use. Therefore, the proposed project would not be considered growth-inducing for these reasons.

B2. Economic Growth

Construction of the proposed project would result in a temporary increase in construction-related job opportunities in the local area. However, opportunities provided by construction of the project would not likely result in household relocation by construction workers to the vicinity of the project site. The construction industry differs from most other industry sectors in several ways.

- Construction employment has no regular place of business. Rather, construction workers commute to job sites that may change several times a year.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills.
- The work requirements of most construction projects are also highly specialized and workers are employed on a job site only as long as their skills are needed to complete a particular phase of the construction process.

Additionally, construction workers could be expected to be drawn from the construction employment labor force already resident in San Francisco and surrounding communities. It is not likely that construction workers would relocate their place of residency as a consequence of working on the proposed project. Employment opportunities provided by construction of the project would not constitute a substantial employment growth.

The proposed project does not include the development of housing, and therefore, the project would not directly contribute to population growth in the area. However, the project would accommodate a projected increase of 21,860 total students and 700 total faculty and staff. The campus “population” increases associated with the project could indirectly lead to economic growth due to an increased use of

local businesses that serve the campus (e.g., restaurants, gas stations, banks, etc.). This demand would be somewhat offset by the services already offered by the campus. Further, the projected increase in full-time faculty and staff could induce people to move into the area and lead to associated economic growth in the region. The number of people that move to the Main Campus vicinity or Bay Area would depend in part on the affordability of available area housing relative to faculty and staff salaries. Therefore, the proposed project would be considered growth inducing for these reasons.

B3. Development of Open Space

The Main Campus and the surrounding areas are already developed. The Master Plan would involve development within the existing campus boundaries and on the Balboa Reservoir. Therefore, implementation of the Master Plan would not involve the development of open space or of land adjacent to open space, and thus, would not be considered growth-inducing in that sense.

C. SIGNIFICANT IRREVERSIBLE IMPACTS

The CCSF Main Campus is completely developed and is within an urban area. However, the projects associated with the Master Plan would represent a long-term commitment to a more intensive land use, in that the Main Campus would be expected to accommodate more students and faculty. The Master Plan would involve an irreversible commitment to the use of non-renewable resources during the construction and operation phases in the form of refined petroleum-based fuels, natural gas for space and water heating, and mineral resources used in construction materials. CCSF already uses substantial amounts of these resources. Mitigation measures are identified in **Section 4.3, Transportation and Circulation**, to try to minimize the increase in automobile trips; such measures would also address some of the increases in fuel usage.

The Main Campus does not use or transport large amounts of hazardous materials. Hazardous materials use is primarily associated with academic department use or campus facilities and landscape maintenance. CCSF would follow all applicable requirements to ensure safe use, storage and disposal of any hazardous materials or wastes on campus. For these reasons, the project would not result in any irreversible damage from environmental accidents associated with the project.

The Main Campus and its vicinity are within an urban area and the campus is already developed. The Master Plan would extend the built campus across Phelan Avenue onto the eastern half of the Balboa Reservoir, but the western half would still be available for future use as a reservoir. The Master Plan would not involve any extensions of infrastructure into undeveloped areas. Therefore, the project would not commit future generations to new developed uses.

D. UNAVOIDABLE SIGNIFICANT IMPACTS

D1. Land Use and Planning

The Master Plan could result in impacts on the character of the vicinity due to the increased intensity of use of the Main Campus. These changes could be experienced together as negative changes to the quality of life in the area. This significant impact could be reduced substantially by the implementation of transportation demand management measures and enforced residential parking permit requirements, but would remain significant after mitigation because the effectiveness of mitigation is not known at this time.

D2. Visual Quality and Shadow

As discussed in more detail in **Section 4.2, Visual Character**, the proposed development would produce changes in the visual character that may not necessarily constitute a “substantial degradation” of the visual character of the area, but could be perceived as such. For example, the proposed buildings west of Phelan Avenue could negatively affect the character of the surrounding area due to the large scale and more visible nature of the proposed buildings. This is considered to be a significant effect. CCSF would implement mitigation measures for individual Master Plan projects that would reduce this impact, but some of the impact could be inherent in the size and placement of the buildings. For this reason and in the absence of specific design information, the impact would remain significant after mitigation.

D3. Transportation and Circulation

Impacts related to increased traffic on Havelock Street would be reduced through the provision of sidewalks, incorporation of design features into the garage to discourage entry to the garage from the north, and implementation of TDM measures to reduce future vehicle traffic levels. However, there are uncertainties attached to these measures and their effectiveness, and the construction of sidewalks is under the jurisdiction of another agency. For those reasons, the impacts on Havelock Street would remain significant.

Impacts related to a single garage entrance on Phelan Avenue would be reduced through the extension of Lee Avenue to and through the reservoir, provision of a second garage entrance on Phelan Avenue, incorporation of design features to promote efficient use of the parking, and implementation of TDM measures to reduce future vehicle traffic levels. However, there are uncertainties attached to these measures and their effectiveness, and the extension of Lee Avenue is under the jurisdiction of another

agency. For those reasons, the impacts related to garage access (and related congestion/hazards on Phelan Avenue) would remain significant.

Cumulative impacts to the three local intersections would be reduced to less-than-significant levels with the improvements identified in this section. However, the mitigation is within the purview of other agencies, which have not agreed at this point to implement the measures. In the absence of a commitment by the City and Caltrans to implement the measures, the impacts would remain significant.

D4. Noise

Buildout of the Main Campus Master Plan would generate short-term construction noise and might generate groundborne vibration that could affect campus facilities, nearby residences and schools, and other sensitive receptors. Impacts related to construction noise and vibration would be reduced through implementation of all feasible construction noise/vibration controls, but would remain significant after mitigation. Cumulative construction noise impacts would also remain significant.

D5. Air Quality and Wind

Implementation of the Main Campus Master Plan would be guided by a number of transportation and parking principles aimed at reducing the number of vehicle trips to and from the campus. These principles include a commitment to implementation of a transportation demand management (TDM) program. Successful TDM programs that are comprehensive and strongly supported have been found to be effective in reducing motor vehicle trips by 15 to 25 percent. If the CCSF TDM program were to be as successful, it would be expected that emissions of reactive organic gases (ROG) and fine particulate matter (PM₁₀) at project buildout in 2015 would decline by 15 to 25 percent, to between 93.2 and 105.6 pounds per day (ppd) for ROG and 66.2 and 75.1 ppd for PM₁₀. Implementation of the TDM program would reduce existing vehicle trips, offsetting some of the trips from the additional students and reducing pollutant emissions still further. However, implementation of all of the TDM measures is not guaranteed, and the exact effectiveness is not known at this time. Consequently, with the buildout of the remainder of the Master Plan, the project could generate average daily direct and indirect emissions that would exceed the BAAQMD-recommended thresholds for reactive organic gases (ROG) and fine particulate matter (PM₁₀), (as shown in **Table 4.5-3, Estimated Operational Emissions**). Therefore, operational emissions associated with Master Plan buildout are considered an unavoidable and significant impact.

D6. Public Services and Utilities

The increase in population and square footage on the campus would result in an increase in demand for fire services. The San Francisco Fire Department has noted the need for a new fire station to accommodate the additional staff and equipment, but no station has been proposed at this time nor a location identified. The increase in demand for fire services would be significant according to City and County of San Francisco criteria. Mitigation identified in this section would require CCSF to work with SFFD to determine an appropriate contribution toward the cost of a new fire station when (if) one is needed, but construction of the station would be within the authority of the SFFD and cannot be assumed at this time. For that reason, the impact would remain significant. CCSF is served by the San Francisco Department of Public Works (SFDPW) sewer system, which handles both sewage and storm water runoff in the same network of pipes. According to SFDPW, the wastewater treatment and pumping facilities are of adequate capacity to handle any additional flow from the campus area. At the same time, SFDPW has indicated that the existing sewer/stormwater lines located around the Main campus are adequate to accommodate the additional sanitary flow expected from Master Plan buildout, but are, and would continue to be, undersized to handle the wet weather flow generated by the 5-year storm event. The wastewater flows added by the Master Plan would worsen this condition and would cause a significant impact with respect to stormwater system capacity. The needed mitigation (upgrade of the system) is under the purview of the SFDPW, which has indicated that adequate funding is not available. Without this mitigation, the impact to the wastewater/stormwater system would remain significant.

D7. Geology, Seismicity and Soils

There would be no unavoidable significant impacts.

D8. Hazards

There would be no unavoidable significant impacts.

D9. Cultural Resources

There would be no unavoidable significant impacts.

E. EFFECTS FOUND NOT TO BE SIGNIFICANT

This section covers topics in Appendix G of the *CEQA Guidelines* (Environmental Checklist Form) that are considered to be less-than-significant effects of the proposed Master Plan, and therefore are not

discussed in **Chapter 4.0** of this EIR. Information regarding the features of the proposed project comes from the draft City College Master Plan. All other topics are discussed in **Chapter 4.0** of this EIR.

E1. Agricultural Resources

Project would not convert prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use, conflict with existing zoning for agricultural use, or a Williamson Act contract or involve other changes in the existing environment which could result in conversion of farmland to non-agricultural use. The CCSF Main Campus is completely developed and is surrounded by urban uses. Therefore, there would be no impacts to farmlands due to the proposed project.

E2. Biological Resources

Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The Main Campus is completely developed and is within an urban area. The campus contains vegetation in the form of landscaping, trees, lawns, and athletic fields. There is an unmaintained area in the northeastern part of the campus with eucalyptus trees. Although these areas of vegetation support some common wildlife species, there are no natural vegetation communities on the campus, and the existing landscaping does not provide suitable habitat for special-status species. Therefore, the Master Plan would not have any impacts on species of concern.

Common wildlife species associated with urban environments such as striped skunk (*Mephitis mephitis*), raccoon (*Procyon lotor*), American robin (*Turdus migratorius*), and northern mocking bird (*Mimus polyglottos*) could occur on the site. Although the removal of trees associated with the project could result in adverse effects on the habitat of some common species, it is not expected to diminish or result in the permanent loss of these species or adversely impact the local population as a whole, due to the already developed nature of the site.

The campus contains suitable nesting habitat for a number of bird species, including raptors. Bird nests with eggs or young are protected under the Migratory Bird Treaty Act and the California Fish and Game Code. Construction-related activities and tree removal could result in the direct loss of active nests or the abandonment of active nests by breeding birds. Most of the trees on the Main Campus would be retained; the primary trees that would be removed include some of the Monterey cypress trees and conifers west of the practice field and the cypress trees adjacent to Lot F. Depending on the number and extent of bird nests on the site that may be disturbed or removed and the rarity of the species affected,

the loss of the nests could be a significant impact. However, CCSF would implement the following measures to avoid impacts to existing bird nests.

1. A qualified biologist would conduct nest surveys on the site prior to construction or site preparation activities occurring during the nesting/breeding season of native bird species (typically February through August). The surveys would be conducted no earlier than 14 days prior to commencement of construction activities.
2. If active nests of bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code (which, together, apply to all native nesting birds) are present in the construction or within 200 feet of these areas, a fence would be erected at a minimum of 50 feet around the nest site. This temporary buffer may be greater depending on the bird species and construction activity, as determined by the biologist.
3. At the discretion of the biologist, clearing and construction within the fenced area would be postponed or halted until juveniles have fledged and there is no evidence of a second nesting attempt. The biologist would serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.

Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The Main Campus is completely developed, does not contain any riparian habitat, and is not identified in any adopted plan as having sensitive natural communities. Therefore, the Master Plan would not have any impacts on sensitive communities.

Project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. The Main Campus is completely developed, and there are no wetlands on the campus. Therefore, the Master Plan would not result in any impacts to wetlands.

Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The campus is completely developed, is bounded by I-280 and major roadways, and is within an urban area. Therefore, the campus does not provide any wildlife movement corridors or nursery sites, and the Master Plan would not have any impacts on such resources.

Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Because of the urbanized nature of the campus and surrounding area, there are no impacts with respect to biological resources protected by local policies except for the trees that would be removed for construction reasons. The City of San Francisco has an Urban Forestry Ordinance that requires protection and maintenance of trees within the City including Landmark Trees. This ordinance would not apply, as CCSF is under the jurisdiction of the State of California.

Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or the provisions of an adopted Habitat Conservation Plan. There are no adopted habitat conservation plans that apply to the Main Campus. Therefore, there would be no related impact.

E3. Hydrology

Project would not violate any water quality standards or waste discharge requirements. The uses anticipated within the campus would be similar to existing uses and would not create effluent discharges from a point source. CCSF would comply with all state and federal regulations related to non-point discharges. Therefore, the project would not violate any waste discharge requirements.

Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The Main Campus is already developed, and the proposed land uses would be similar to existing uses. Therefore, there would be no impacts related to groundwater recharge. Water is supplied to the campus by the SFPUC through the City distribution system. Therefore, campus water consumption would have no effect on local groundwater supplies.

Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. The Main Campus is developed, and runoff from the campus drains to the City combined wastewater/storm drainage system; there are no natural surface watercourses on campus. The development built as part of the Master Plan would result in similar uses to those now present. Most proposed uses would be constructed in areas that are already paved or developed with structures; the existing practice field would be relocated (to a currently developed area) and would remain on campus. Therefore, the proposed projects would not substantially alter existing drainage patterns.

Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. The proposed drainage system would connect to the City combined wastewater/storm drainage system,

which carries wastewater and stormwater flows to the Oceanside Water Pollution Control Plant for treatment. Most proposed uses would be constructed in areas that are already paved or developed with structures; the existing practice field would be relocated (to a currently developed area) and would remain on campus. The Master plan would also result in the creation of additional green spaces. For these reasons, little or no net increase in impervious surfaces is expected. Therefore, there would not be a substantial increase in stormwater runoff from the project. (Potential impacts from the addition of wastewater to the undersized pipes in the campus vicinity are addressed as part of **Section 4.6, Public Services and Utilities**).

Development of the Master Plan could result in declining quality of stormwater runoff due to increased soil erosion and downstream sedimentation during project-related local construction and non-point source urban pollutants (from increased traffic on area streets, for example).. Construction-related impacts would be avoided through preparation of a Stormwater Pollution Prevention Plan (SWPPP), which is required under NPDES for any development over one acre. Stormwater runoff would be carried to the Oceanside Plant, which meets all Federal and State discharge standards and removes approximately 95 percent of the pollutants from the wastewater stream before discharging it into the Pacific Ocean through the 4.5-mile Southwest Ocean Outfall. CCSF would continue to implement standard Best Management Practices (BMPs) to reduce non-point source pollution during project construction and operation. In addition, the proposed implementation of Transportation Demand Management measures would help to reduce CCSF-related traffic on area roads. For these reasons, potential impacts to water quality would be less than significant.

Project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map or place within a 100-year flood hazard area structures which would impede or redirect flood flows. According to the San Francisco *General Plan* there are no areas prone to surface flooding in San Francisco. In addition, the project does not propose construction of any housing. Therefore, there would be no flood-related impacts.

Project would not expose people or structures to inundation by seiche, tsunami, or mudflow. Seiches are waves in an enclosed body of water. A review of area maps shows that the nearest large enclosed bodies of water, (Lake Merced and a reservoir to the west) are approximately two miles from the campus. According to the San Francisco *General Plan*, tsunamis are not common on the California Coast, and the Master Plan is not identified in the area where tsunamis are thought to be possible. The *General Plan* did not mention mudflows as a hazard. Based on this information, there would be no significant impacts as a result of seiches, tsunamis, or mudflows.

E4. Mineral Resources

Project would not result in the loss of availability of a known mineral resource of value to the region and the residents of the state, or result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. The campus is already developed, and thus is not available as a mineral resource. The City of San Francisco *General Plan* indicates that minerals are not found in San Francisco to any appreciable extent. Therefore, there would be no impact in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State.

E5. Population and Housing

Project would not displace substantial numbers of existing housing or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. As a community college, CCSF does not provide housing. Therefore, the proposed project would not result in the displacement of existing housing or a need to build replacement housing.