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A. MARKS, MILTON, CCSF TRUSTEE

- A-1. As Mr. Marks has stated, his comment letter includes comments on both the EIR and Master Plan. The following responses address Mr. Marks' comments on the EIR. His comments on the Master Plan have been forwarded to the CCSF Master Plan team.
- A-2. Mr. Marks' desire that the Board of Trustees had "signed off" on the Master Plan prior to the EIR process is noted for the record. In June 2003, an earlier version of the draft Master Plan was presented at a CCSF Board of Trustees Facilities Review Committee meeting. The Master Plan team received comments from Mr. Marks on the Master Plan in August 2003; no comments were submitted by other Trustees. Mr. Marks' comments were discussed in detail at a meeting attended by Mr. Marks and various members of the Master Plan team, including James Blomquist and representatives from Skidmore, Owings & Merrill LLP and BMS Design Group.
- A-3. Mr. Marks' requests that the Board of Trustees separate consideration of the EIR and Master Plan, and that the decision on the Master Plan be postponed until after the Planning Commission hearing, are noted for the record.
- A-4. The EIR is intended to satisfy the requirements for a project-specific EIR covering the proposed Community Health & Wellness Center. The Draft EIR states: "It is expected that this EIR will provide the legally required environmental analysis for the approval of the Community Health & Wellness Center project, practice field relocation, Health Center and Child Development Center projects. Thus, supplemental environmental review will occur only as required by CEQA." (Draft EIR, p. 3.0-26)

The process for determining the requirements of supplemental review is also discussed in the Draft EIR. "Per Section 15168 of the CEQA Guidelines, specific campus development projects will be 'examined in the light of the program EIR to determine whether an additional environmental document must be prepared.' If a specific campus project would have significant environmental impacts that were not examined in this EIR, a new Initial Study would be prepared that would lead to either a focused supplemental EIR or a Negative Declaration. If the specific project has been adequately addressed by this EIR (considering the characteristics of the project, changes in conditions, and possible new information) or does not result in new or substantial increases in significant environmental impacts, no additional environmental documentation is required." (Draft EIR, p. 3.0-25)

- A-5. The Draft EIR correctly states the order of the approvals: "The Board must certify the Final EIR before making its decision on the proposed Master Plan." (Draft EIR, p. 3.0-25) This order is required by the California Environmental Quality Act and its implementing Guidelines. For example, Guidelines Section 15005 states, "Before granting any approval of a project subject to CEQA, every lead agency...shall consider a Final EIR..."

Regarding Board “preliminary approval” of the Master Plan prior to the EIR process, see the response to Comment A-2.

A lead agency (approving body) can make changes to a proposed project after an EIR is certified. In this case, minor changes can be incorporated into the final Master Plan, with a memorandum to the file confirming that the changes would not result in additional adverse environmental impacts. Major changes could require additional environmental review if the changes resulted in a new significant environmental impact or a substantial increase in a significant impact already in the EIR.

- A-6. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-7. “Lead agency” is defined in Section 15367 of the CEQA Guidelines as “the public agency which has the principal responsibility for carrying out or approving a project.” The lead agency concept is discussed in Article 4 of the CEQA Guidelines. Where two or more public agencies will be involved with a project, the public agency carrying out the project “shall be the lead agency” even if the project would be located within the jurisdiction of another agency. There is flexibility in identifying a lead agency only where two or more public agencies have “ a substantial claim” to be the lead agency.
- A-8. Typically, lead agencies prepare a Draft EIR that contains the environmental analysis of the project and Responses to Comments document that responds to comments received on the Draft EIR. Together, these documents constitute the Final EIR. The documents referred to by Mr. Marks were the “Draft EIR” components of the Final EIRs for the North Beach/Chinatown and Mission campuses, and as such were cited correctly. The EIRs for both campuses have been certified by CCSF.
- A-9. See the topical response **Other Issues, City and County of San Francisco Jurisdiction, in Section 10.0, Topical Responses.**
- A-10. See the topical response **Other Issues, City and County of San Francisco Jurisdiction, in Section 10.0, Topical Responses.**
- A-11. See the topical response **Other Issues, City and County of San Francisco Jurisdiction, in Section 10.0, Topical Responses.**
- A-12. CEQA requires that “An EIR shall describe feasible measures which could minimize significant adverse impacts...” (Guidelines, Section 15126.4) The determination that a mitigation measure is feasible is ultimately made by the lead agency as part of the findings it makes on a project; for that reason, EIRs often include measures that might be feasible. If the Board or others can

identify other feasible mitigation measures that could minimize a particular impact, they are welcome to do so, and those measures would be incorporated into the Final EIR.

The Draft EIR includes several mitigation measures that could reduce an impact but that have uncertain effectiveness. Given this uncertainty, the Draft EIR cannot conclude that the impact would be reduced to a less-than-significant level. In each of these cases, the Draft EIR has identified the impact as significant with mitigation. Where an impact is significant after mitigation, the Board of Trustees has to approve a Statement of Overriding Considerations that essentially says that the benefits of the project outweigh the impact.

All mitigation measures adopted as conditions of project approval will be included in a Mitigation Monitoring and Reporting Program (MMRP), which tracks the implementation of each measure. The MMRP is the main means for CCSF and the public to see that the mitigation measures are being implemented. If the EIR has identified a measure as having uncertain effectiveness and the measure is not “achieved as proposed,” there is no public recourse or District liability because the EIR has disclosed the possibility that the measure might not be effective.

- A-13. The first part of the comment relates to Master Plan compliance with the City requirements for Institutional Master Plans. CCSF has met routinely with the San Francisco Planning Department over the last two years to discuss development of the Master Plan projects.

The second part of the comment relates to the analysis of the combined impacts of the Main Campus Master Plan and the planned improvements at the other CCSF campuses. Each impacts section of the Draft EIR contains a subsection that considers the combined impacts. The combined impacts are analyzed using the same significance thresholds used for the analysis of Main Campus impacts. As the Draft EIR states, “improvements at most of the other campuses would be minor, and the improvements at the Chinatown and Mission campuses have already been addressed in certified environmental review documents.” (Draft EIR, p. 3.0-25). In most cases, the CCSF campuses are too far apart for the impacts at the campuses to combine.

The third part of the comment relates to utilizing facilities at other campuses to reduce the environmental impacts at the Main Campus. This possibility was considered as a potential project alternative in **Section 6.0, Alternatives**. The concept was “rejected as an alternative because of its likely infeasibility and its inability to meet College objectives. The Master Plan already reflects the goal of shifting some of the projected growth in student enrollment to other campuses in the CCSF system. None of these campuses has the room to serve as a substitute for the Main Campus.” (Draft EIR p. 6.0-3)

- A-14. See the topical response **Other, Noticing and Distribution, in Section 10.0, Topical Responses**.

- A-15. The Board of Trustees cannot approve the proposed Community Health & Wellness Center prior to certification of the EIR and approval of the Master Plan. The EIR includes an estimated date of spring 2004 for construction of the Center to begin.
- A-16. Please see the topical response **Other Impacts, Construction Impacts**, in **Section 10.0, Topical Responses**.
- A-17. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-18. According to a City College representative, there are no written tree maintenance policies and standards. The College calls in an arborist from Golden Gate Park for advice when needed. The characterization of certain trees and grasses on the Main Campus as being “unmaintained” (Draft EIR p. 4.2-3) was intended to distinguish those areas from the formalized landscaping on the campus. The primary “unmaintained” area is the grove of eucalyptus trees in the northeastern corner of the campus.
- A-19. The use of a certified arborist and assessment of tree “value” were recommended by staff at the San Francisco Urban Forestry Council. The purpose of using a certified arborist is to ensure that trees are relocated or replaced based on the recommendations of a qualified professional. The determination of tree “value” based on criteria developed by the Council of Tree and Landscape Architects would provide the arborist a basis for his/her recommendations regarding tree relocation or replacement. The mitigation was established in this way to provide for replacement at greater than a 1 to 1 ratio, depending on the value of the removed tree(s); the language in Mitigation Measure Visual-2c specifies “a ratio of at least 1 to 1 (or higher if recommended by the arborist).” (Draft EIR, p. 4.2-17)
- A-20. See the response to Comment A-19.
- A-21. The Draft EIR is not specifically recommending that the District adopt a new tree protection and care policy; Mitigation Measures **Visual-2a** through **-2d** are intended to address the potential tree loss resulting from the Main Campus Master Plan.
- A-22. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-23. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-24. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.

- A-25. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration. The soil preparation proposed includes the amending of relatively poor soils with additional nutrients and establishing better-draining soils. These types of preparation are standard landscape procedures and do not result in significant environmental impacts.
- A-26. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-27. The Draft EIR (p. 4.2-12) describes existing regulations related to tree protection. The San Francisco Board of Supervisors passed an ordinance in 2001 that authorized establishment of an Urban Forestry Council; only land within the jurisdictional boundary of the City and County of San Francisco is under the Council's authority. As of the date of publication of the Draft EIR, the Council had been established and was working on a Citywide plan for urban forestry; there were no adopted plans at that time.

As also stated in the Draft EIR (p. 4.2-12), the removal of trees within the public right-of-way requires a permit under Article 16 of the San Francisco Public Works Code. The Public Works Code also includes protections for "landmark trees," but there are no trees of landmark status on the Main Campus. CCSF would comply with all applicable City ordinances and requirements related to tree protection.

The commenter's recommendation that tree protection policies "that may be developed for interior portions of the District's properties should also apply to street trees" is noted for the record.

- A-28. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-29. The statements about the locations of trees on the Main Campus and their visual "functions" are descriptions of existing conditions only and are not meant (in that context) to imply conclusions regarding the desirability of visual connections to the community.
- A-30. The statement regarding CCSF visual quality policies and practices was based on a discussion with CCSF staff, and has been reconfirmed.
- A-31. To comply with CEQA, the EIR should consider relevant land use plans and policies "adopted for the purpose of avoiding or mitigating an environmental effect" (CEQA Guidelines, Appendix G). In this context, all of the relevant policies from the San Francisco General Plan, including those policies regarding the relationship of an educational campus and adjacent uses, are included in **Section 4.1, Land Use and Planning**, of the Draft EIR. The policies that specifically mention the relationship between campus and communities focus on minimizing "disruption of adjacent

residential areas” (Residence Element, Objective 12, Policy 3; Commerce and Industry Element, Objective 7, Policy 2). (Draft EIR, p. 4.1-5) Policies that refer more generally to urban design and nearby uses emphasize compatibility and harmony as well as respect for existing patterns (see the policies under Urban Design Element, Objective 3, for example; Draft EIR, p. 4.1-9).

The Draft EIR also includes a discussion of the draft *Balboa Station Area Plan* for informational purposes (the *Plan* has not been adopted and thus does not have official status). One of the key strategies of the draft *Plan* is “Integrate City College Into the Community.” The *Plan* envisions fulfilling this strategy by directing development of new campus facilities to the eastern edge of the campus first and by developing active facilities along Ocean Avenue (among other policies). Policies relating to development on the Balboa Reservoir emphasize respect of the grid structure of the surrounding neighborhoods “so that the reservoir in the future can become an amenity connected to the neighborhood rather than isolated from it.” (Draft EIR, pp. 4.1-11, -12)

The analysis of policy consistency in the EIR focused on the relationship of policies to potential physical environmental impacts. Visual impacts related to the character of existing development (Urban Design Element, Policies 3.5, 3.6, and 3.8) were identified as significant in the EIR. (Draft EIR, p. 4.1-19) Design or visual connection issues that are not related to adverse physical environmental impacts are not within the scope of the EIR, but may be considered by the Board of Trustees as part of its decision-making process.

- A-32. The policies of the draft *Balboa Station Area Plan* have not been adopted by the City. Although they may represent the City’s intent, they have no official status. Nevertheless, the Draft EIR includes discussion of draft *Plan* policies for informational purposes. The discussion of potential impacts to visual character refers to draft Policy 2.1; in that paragraph, the Draft EIR concludes that “the proposed Master Plan development could be perceived as visually out of scale with these [adjacent] neighborhoods.” (Draft EIR, p. 4.2-20) “Noncompliance” with the policies would not in itself be a substantial degradation of the existing visual character, the relevant issue for the EIR analysis.
- A-33. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-34. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-35. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-36. Mitigation Measure **Visual-3b** states: “CCSF shall establish a Design Review Committee, to consist of members of the CCSF Board of Trustees, to review the design of all major structures on

the Main Campus. The review shall consider compliance of the design with the Master Plan principles and design guidelines and the mitigation in this EIR. The review shall be open to the public." (Draft EIR, p. 4.2-22)

- A-37. The intent of the analysis on p. 4.2-19 is to consider the impact of the proposed project on existing conditions; the CEQA threshold of significance is whether the project would substantially degrade the existing visual character of the project site or its surroundings. The site of the proposed Community Health & Wellness Center is mainly a practice field and parking lot; the existing views of the site includes trees as well as a busy roadway and utility lines. The proposed project would result in construction of a building on that site. The Draft EIR accurately describes, based on visual simulations, the physical characteristics of a view from Ocean Avenue after the building has been constructed. If the building had been more prominent in the view or fewer trees were visible, the EIR would also have described that condition, and would have based its analysis of changes to visual character on that configuration. The Draft EIR does not state that greater visibility from that particular viewpoint would be a significant impact requiring mitigation.
- A-38. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-39. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-40. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-41. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-42. The establishment of a Design Review Committee is included as mitigation for potential impacts to visual character because it appears to be an appropriate means of ensuring that the design guidelines of the Master Plan are met. The establishment of committees to implement all mitigation measures is not required by CEQA, and may or may not be appropriate, depending on the particular issue. Concurrent with approval of the Master Plan, the Board of Trustees will be asked to consider a Mitigation Monitoring and Reporting Program, which sets forth a means of monitoring implementation of each mitigation measure identified in the EIR.
- A-43. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-44. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.

- A-45. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-46. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-47. Please see the topical response **Transportation and Circulation, Need for On-Campus Parking**, in **Section 10.0, Topical Responses**.
- A-48. Please see the topical response **Transportation and Circulation, Transportation Demand Management**, in **Section 10.0, Topical Responses**.
- A-49. Please see the topical response **Transportation and Circulation, Parking Fees**, in **Section 10.0, Topical Responses**.
- A-50. Please see the topical response, **Transportation and Circulation, Transportation Demand Management**, in **Section 10.0, Topical Responses**.
- A-51. See the responses to Comments A-48, A-49, and A-50.
- A-52. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-53. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
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- A-56. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-57. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-58. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-59. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.

- A-60. The EIR is based on the November 19, 2003 draft of the Master Plan, which shows a campus road extending from Ocean Avenue (at Howth) to Havelock Street (see Master Plan p. 75, for example).
- A-61. Please see the topical response **Transportation and Circulation, Analysis of Lee Avenue Entrance**, in **Section 10.0, Topical Responses**.
- A-62. There is no specific timetable attached to the conversion of Cloud Circle. Conversion would result in the loss of parking spaces, which would need to be replaced elsewhere. Conversion would involve construction, paving, and planting, which would require funding.
- A-63. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-64. The text at the bottom of p. 4.3-11 of the Draft EIR has been revised to match the text on p. 80 of the Master Plan (“CCSF has a student population that resides throughout the City and adjacent cities”). See **Section 12.0, Revisions to the Draft EIR**.

The discussion referenced by the commenter (Draft EIR, p. 4.3-12) notes that the Ingleside neighborhood is within convenient cycling distance to the Main Campus and is home to the greatest number of CCSF students, but that there are “relatively few facilities that serve cyclists.” The Draft EIR also notes that few bicyclists were observed on campus and on adjoining roads, and that on-campus bike support facilities are limited. Topography and gaps in the bicycle network combine to limit bicycle travel to and from the campus. It should be noted that the Master Plan does call for providing secure bicycle racks for all new campus buildings; bicycle “storage rooms,” lockers and showers are being considered (DEIR page 3.0-20).

A survey of students to determine what might increase bike use was not conducted. The recommendations included in the draft Master Plan are based on generally accepted practices and the professional judgment and experience of the Master Plan team.

- A-65. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-66. CCSF would designate construction worker parking locations on or adjacent to construction sites. It is assumed that at least some construction workers would use transit to reach the job site. CCSF would work to maintain the current parking availability for students and staff. For example, the proposed removal of the center berm between the north and south Balboa Reservoir basins would provide spaces that would more than offset the spaces lost when the Community Health & Wellness Center is constructed. Proposed Master Plan projects would occur over time, and temporary parking areas can be designated for construction workers as needed. In the short term, CCSF would have access to spaces in the western half of the reservoir.

- A-67. CCSF is committed to disposing of all buildings through a salvage disposal process. This process would assure that materials are recycled to the greatest extent possible. Many of the buildings proposed for “demolition” are “bungalows,” portable buildings that would be dismantled and removed and that could have limited recycling value. The experience of the EIR preparers with construction schedules and impact analyses for specific projects indicates, that the major construction noise, air quality, and traffic impacts would be created during earthmoving (and possibly, foundation construction). **Section 4.4** of the Draft EIR has been revised to include a mitigation measure that requires CCSF to incorporate building deconstruction and recycling techniques where and when feasible (see **Section 12.0, Revisions to the Draft EIR**).
- A-68. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-69. Please see the topical response **Transportation and Circulation, Transportation Demand Management**, in **Section 10.0, Comments and Responses**.
- A-70. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-71. The introduction to Mitigation Measure **Air Quality-2a** states: “CCSF shall commit to implementation of the TDM program outlined in the Master Plan (to the extent feasible and in compliance with State law) in order to reduce operational emissions related to vehicles traveling to and from the Ocean Avenue Campus.” All of the measures listed under the introduction, including increasing parking fees, are intended to reduce vehicle trips (and the associated noise and air pollutant emissions) in some way.
- A-72. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-73. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration. See also the topical response **Analysis of Lee Avenue Entrance** in **Section 10.0, Comments and Responses**.
- A-74. The following policies and objectives are relevant to the Master Plan project and have been added to **Table 4.5-4** of the EIR: (1) Policy 4.1 (under 1. Design Streets for People, Objective 4), and (2) Objective 4 (under 4. Build with a Sense of Place). See **Section 12.0, Revisions to the Draft EIR**.
- Policy 3.2 (1. Design Streets for People, Objective 3) would not apply to the CCSF Master Plan EIR because it is explicitly directed at efforts the City should make in conjunction with property owners. Policy 2.3 relates to the Phelan Loop, which is not within CCSF jurisdiction. Strategy 3 (which is referred to in the comment as Objective 3) and the three policies referenced by the commenter refer to housing. The Master Plan does not have any provisions for housing, and the

potential benefits of additional housing on air quality are unknown (because, for example, the occupants would generate off-campus trips).

- A-75. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-76. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-77. The “5-year storm event” is reported in the EIR because it is the “design storm” used by the SFDPW. Although Mr. Marks’ concern about more frequent overflows is understood, SFDPW did not identify any significant issues related to more frequent storms. (Draft EIR pp. 4.6-5, 4.6-13)

The Draft EIR notes that the development under the proposed Master Plan “includes elements designed to reduce wastewater generation. Specifically, as outlined above, new construction would include innovative wastewater technologies to reduce generation of wastewater, and overall water use reduction, to reduce the burden on the municipal wastewater system.” (Draft EIR, p. 4.6-14) Specific measures would be identified as the designs for individual buildings are developed. The Draft EIR has been revised to include mitigation requiring the use of wastewater-reducing features in project design and the incorporation of features to increase pervious areas (and thus reduce future stormwater runoff). See **Section 12.0, Revisions to the Draft EIR**.

- A-78. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.
- A-79. The Maher Ordinance concerns the analysis of soil for hazardous waste. Thus, City College would not likely be subject to the ordinance. For a discussion of City College’s need to comply with a City’s ordinances, see the topical response **Other Issues, City and County of San Francisco Jurisdiction**, in **Section 10.0, Topical Responses**. However, the College may choose to comply with the Maher Ordinance, even if not subject to the ordinance, and would comply with all applicable City, state, and federal requirements regarding hazardous waste. The EIR analyzed hazardous waste issues related to the Master Plan in **Section 4.8, Hazards**.
- A-80. The San Francisco Department of Public Health does have enforcement and inspection duties related to hazardous materials at City College. Specifically, SFDPH inspects the campus’ underground storage tanks annually and inspects hazardous waste pursuant to Article 21 as well as waste generation on the campus every two to three years. The ongoing handling of hazardous materials for use at the Main Campus is an existing condition and not an impact of the proposed project. See also the topical response **Other, Noticing and Distribution**, in **Section 10.0, Topical Responses**.

- A-81. There is no standard amount applied to this significance threshold, but given the context and the other thresholds identified, a reasonable approach would be to consider whether the project would cause a significant hazard to the students at the schools. The Draft EIR concludes that “Given the nature, volume, and use of the materials described in this section, the project would not raise significant issues with respect to upset conditions or the handling of acutely hazardous materials near schools.” (Draft EIR, p. 4.8-11) The Draft EIR includes a discussion of current campus hazardous material use and hazardous waste generation and disposal, on pp. 4.8-2 through 4.8-4.
- A-82. To comply with CEQA, an EIR is required to compare the conditions that result from a proposed project with existing conditions (specifically, the conditions present at the time of the Notice of Preparation). The EIR did not find any significant adverse impacts associated with hazardous materials use resulting from implementation of the Master Plan project. Therefore, since the Master Plan project would not cause a significant hazardous materials impact, the District is not obligated to reduce hazardous materials use .
- A-83. This comment regarding the Master Plan is noted for the record, and has been forwarded to the CCSF Master Plan team for consideration.