March 16, 2004

Mr. Peter Goldstein
Vice Chancellor
City College of San Francisco
33 Gough Street
San Francisco, CA 94103

Dear Mr. Goldstein:

Below please find the comments of the San Francisco Planning Department on the Draft Environmental Impact Report (DEIR) for the City College of San Francisco Master Plan. Thank you for the opportunity to comment on the document.

*General Comments:*

*Jurisdiction and Approvals*

The following comments relating to jurisdictional issues are based on my current understanding of relevant state law.

- The DEIR tends to misrepresent the jurisdictional relationship between City College and the City of San Francisco relating to the General Plan and the Planning Code. Per California Government Code section 53091, City College, as a school district, is generally bound by section 304.5 of the Planning Code, as well as all other provisions of the Planning Code. However, per Government Code section 53094, the College Board of Trustees, by a two-thirds vote, may render a city or county zoning ordinance inapplicable to a proposed classroom-related use of property by the district.

Since the College may only remove itself from the City's jurisdiction on a case-by-case basis and by a two-thirds vote of the College Board of Trustees, it would be more prudent and conservative to assume for the purposes of the EIR that the development proposals described in the Master Plan and the EIR were subject to the General Plan, the Planning Code and the Priority Policies.

- In some cases, the projects described in the Master Plan and EIR will require discretionary actions of the City of San Francisco. Examples of this include the proposed exchange of the east and west portions of the Balboa Reservoir between the City and the College, as well as the proposed vacation of Ilo Lane as part of the new Chinatown Campus. There may be others as well. These required actions from the City should be disclosed in the EIR wherever known.
In taking these discretionary actions, the Board of Supervisors will need to make a finding that the project in question conforms to the General Plan and the Eight Priority Policies in Section 101.1 of the Planning Code.

- In several places within the DEIR, projects proposed under the Master Plan are described in greater detail than they are in the Master Plan itself. Though not required under CEQA, we would recommend that these details be added to the Master Plan document. Since the College intends to submit the Master Plan to the City to fulfill the Institutional Master Plan requirements in Section 304.5 of the Planning Code, in some cases, these details may be required in the Master Plan.

**Transportation Issues**

- The travel demand analysis outlined on pages 4.3-20 and 4.3-21 makes a very high assumption of 71% for the auto mode split for all trips to the Ocean Avenue campus. This is a *higher* auto mode split than is currently observed according to the College's own documents. The College is using the city's transportation analysis guidelines for most transportation-related analyses in this EIR, but this is one place that the College should use its privilege to depart from the city's guidelines and set a more progressive target. The College is extremely well-served by transit and many of its students are less likely to drive than the population as a whole.

- The transportation demand management (TDM) program outlined in the Master Plan and mandated in the EIR requires annual monitoring of auto mode-split in trips to and from the Ocean Avenue campus, but it does not set up goals to be achieved in terms of non-auto mode splits. The College should set a goal to achieved, consistent with an urban and transit-rich campus. We would suggest a goal of at least 15% fewer auto trips than are currently observed on the campus with no TDM program in place.

- The TDM program mandates that only a *portion* of costs of new parking facilities be recovered through parking fees. The *entire* costs of building new parking facilities should be recovered through fees, as is the practice of the University of California and the State University System, as well as the city's Parking Authority. We would urge the College not to take funds from its educational facilities to subsidize parking.

- The TDM program should be applied to all of the College's facilities, not only the Ocean Avenue campus.

- The transportation analysis is based on conditions for the pm peak hour, which is a standard in this type of analysis. This may also be appropriate in this case, but because the College's uses don't necessarily obey normal morning and evening peaking characteristics, the DEIR should explain the basis for the decision to use pm peak hour for the analysis.
Page-specific comments:

- Page 2.0-5: In the chart on this page, under "Land Use and Planning" we recommend adding a mitigation measure for impacts on existing character which requires the College to adopt a set of building design guidelines to ensure that new buildings are respectful of existing neighborhood scale and character.

- Page 2.0-9: Under mitigation "visual-3b" we recommend including professional architects and planners on the design review committee. Typically design review committees are panels of professionals who advise the policy-makers.

- Page 3.0-9: In the first full paragraph describing circulation for the Wellness Center, a 24-car parking lot is described. We had been under the impression that the parking lot in front of the facility had been removed in favor of a street with curb parking. Please clarify this.

- Page 3.0-19: The first full paragraph on this page refers to a city initiative to change the configuration of Phelan Avenue as a "funded city project for implementation in the near future." This project is not yet funded nor approved by the city. It is supported by city staff at the discussion stage only.

- Page 3.0-23: The last paragraph on this page refers to improvements at two additional campuses (Mission and Chinatown) as being "approved." These projects have not been taken through the City approval process by the College, which will need to happen unless the College Board of Trustees chooses to exempt the College in these cases by a two-thirds vote (see discussion on this above.) In addition, the currently proposed design for the Chinatown facility requires that the Board of Supervisors agree to vacate 1ls Lane and move it to another location. This action has not occurred and would require a finding of conformance with the General Plan before the Board can take that action.

- Page 3.0-27: The list of required approvals on this page should include approvals from the City and County of San Francisco for any required changes to City right-of-way.

- Page 4.1-13: This second paragraph on this page states that the Master Plan would be exempt from the Proposition M requirements because "no city approval is required." In fact, the College would need an approval from the Board of Supervisors for the proposed swap of the east and west reservoirs with the Public Utilities Commission, which is an entity of the City and County. The Board would be required to make Proposition M findings as well as a finding of conformity with the General Plan before taking this action. There may be other proposed projects on the Ocean Avenue campus where city rights-of-way and thus Board of Supervisors approvals are involved, necessitating Proposition M and General Plan conformity findings.

- Page 4.3-3: The second full paragraph appears to state that Phelan Avenue has no curb parking in the section that runs alongside the campus. This is incorrect; this section of Phelan Avenue does have curb parking.
Mr. Goldstein – 3/16/04 – Page 4

- Page 4.3-8: The pm peak headways listed in the table on this page seem incorrect, but we were unable to access Muni data to check them. Please verify them.

- Page 4.3-12: The second full paragraph states that the city intends to install class II bike lanes on Phelan Avenue. As mentioned above, improvements to Phelan Avenue are only at the discussion stage at present.

- Page 4.3-21: The DEIR should explain the source for the assumptions from which mode split and vehicle occupancy figures presented here are derived. Are these based on the city’s transportation analysis guidelines?

- Page 4.9-7 and following: The building descriptions provided here are only from the Ocean Avenue campus. The College also owns the New Mission Theater, which is an historic structure, as well as other facilities around the city. These should also be discussed with regards to their possible status as cultural resources.

Sincerely,

[Signature]

Paul Maltzer
Environmental Review Officer

cc: A. Ghosh, D. Alumbaugh, K. Rich