



University of California
San Francisco

January 14, 2020

Notice of Preparation of Environmental Impact Report and Initial Study Notice of a Public Scoping Meeting

Campus Planning

Real Estate

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Project: UCSF Comprehensive Parnassus Heights Plan
Location: UCSF Parnassus Heights campus site
Block/Lot: 2634A/011 & 005; 1849/054; 1850/001; 1758/043; 1757/035; 1756/001;
1275A/030
Sponsor: University of California, San Francisco (UCSF)
Lead Agency: The Regents of the University of California
Staff Contact: Diane Wong, UCSF (415) 502-5952

This is the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) and Initial Study for the above-named project. This document is available at <http://campusplanning.ucsf.edu/> for a 31-day public review and comment period beginning **January 14, 2020 through February 14, 2020**.

Project Description

The University of California, San Francisco (UCSF) is proposing the Comprehensive Parnassus Heights Plan (CPHP), a conceptual, flexible plan to meet projected space needs for critical programs in research, patient care, and education at the UCSF Parnassus Heights campus site while improving upon the aesthetic and functional design of the campus environment. The Plan also includes opportunities for development of much-needed on-campus housing. While the Plan guides physical development necessary to achieve the University's mission based on projected growth, it is not a commitment for growth or specific projects. It establishes a long-term development framework for the revitalization of the physical environment at Parnassus Heights, by identifying the following:

- Opportunity sites for new buildings and major renovations of existing buildings;
- Candidate buildings for demolition;
- Opportunities for development of open spaces; and
- Opportunities for improvements to on-campus mobility and circulation.

The CPHP includes an Initial Phase that primarily comprises: 1) Irving Street Arrival improvements, 2) Research and Academic Building (RAB), 3) initial Aldea Housing Densification, and 4) New Hospital; as well as other Initial Phase activities. This phase is anticipated to be completed by approximately year 2030. Beyond the Initial Phase, the "Future Phase" encompasses the remaining development described in the CPHP envisioned for completion by the horizon year of 2050.

In total, the CPHP provides for development of approximately 2.9 million gsf of new building space at Parnassus Heights. When accounting for existing campus site development (approximately 3.9 million gsf); demolition that was approved under the

(continued on next page)



2014 Long Range Development Plan (LRDP) but yet not implemented; and potential additional building demolition that would occur under the CPHP, the total amount of campus space upon full implementation of the CPHP would be approximately 6.0 million gsf, including instruction, research, clinical, and support space; housing; and structured parking. The CPHP is available at: <https://ucsf.app.box.com/v/parnassusplan>

Because the CPHP proposes to modify the Parnassus Heights development plans identified in the 2014 LRDP, an amendment of the 2014 LRDP is proposed.

For purposes of the California Environmental Quality Act (CEQA), the University of California is lead agency.

This project may have a significant effect on the environment and an Environmental Impact Report is required. This determination is based upon the criteria of the State CEQA Guidelines, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and for the reasons documented in the Initial Study for the project.

Public Review and Comment

As indicated above, the NOP/Initial Study is available at <http://campusplanning.ucsf.edu/> for a 31-day public review and comment period beginning **January 14, 2020 through February 14, 2020**.

To give written feedback on the NOP/Initial Study, comments should be sent to the attention of Ms. Diane Wong at the address noted below, or submitted via email to the following address: EIR@planning.ucsf.edu. All comments must be received no later than **February 14, 2020**.

If you would like a paper copy of the NOP/Initial Study, please call the UCSF Campus Planning office at 415-476-2911.

Paper copies of the NOP/Initial Study will also be available for viewing at the UCSF Library at 530 Parnassus Avenue, and the following public library branches: San Francisco Main Branch, 100 Larkin Street; Sunset Branch, 1305 18th Avenue; and the Park Branch, 1833 Page Street.

UCSF will hold a public EIR scoping meeting on Monday, February 10, 2020. The meeting will be held at the Parnassus Heights campus site at Millberry Union, 500 Parnassus Avenue, beginning at 6:30 PM.

The EIR scoping meeting provides an opportunity for the community to provide verbal feedback on the Initial Study. This allows UCSF to learn about potential concerns early, as well as further define the issues, feasible alternatives, and potential mitigation measures that may warrant in-depth analysis in the environmental review process.

Submit comments on the Initial Study and EIR scoping to:
Diane Wong, Environmental Coordinator
UCSF Campus Planning
654 Minnesota Street
San Francisco, CA 94143-0286
EIR@planning.ucsf.edu



University of California
San Francisco

INITIAL STUDY

University of California, San Francisco Comprehensive Parnassus Heights Plan

Lead Agency: University of California

January 2020



UCSF COMPREHENSIVE PARNASSUS HEIGHTS PLAN

Initial Study

Prepared for
UCSF Campus Planning

January 14, 2020

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UCSF COMPREHENSIVE PARNASSUS HEIGHTS PLAN

Initial Study

1. Project Information

1. **Project Title:** UCSF Comprehensive Parnassus Heights Plan
2. **Lead Agency Name and Address:** The Regents of the University of California
1111 Franklin Street, 12th Floor
Oakland, California 94607
3. **Contact Person and Phone Number:** Diane Wong
Principal Planner/Environmental Coordinator
UCSF Real Estate - Campus Planning
(415) 502-5952
diane.wong@ucsf.edu
4. **Project Location:** UCSF Parnassus Heights Campus Site
5. **Project Sponsor's Name and Address:** See contact person listed above.
6. **Custodian of the Administrative Record for this Project:** Same as above.
7. **Description of Project:**
See Section 2, Project Description, below.
8. **Surrounding Land Uses and Setting:**
See Section 2, Project Description, below.
9. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.):
See Section 2, Project Description, below.
10. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

On September 9, 2019, UCSF sent notification letters of UCSF's proposal to undertake the CPHP to the applicable representatives for the Amah Mutsun Tribal Band of Mission

San Juan Bautista; Coastanoan Rumsen Carmel Tribe; Ohlone Indian Tribe; Indian Canyon Mutsun Band of Costanoan; Torres Martinez Desert Cahuilla Indians; and Muwekma Ohlone Indian Tribe of the San Francisco Bay Area. No responses to the notification letters were received from the tribes within the 30-day response period, consistent with the requirements of Public Resources Code section 21080.3.1(d).

2. Project Description

2.1 Introduction

Each campus of the University of California is required to periodically prepare a Long Range Development Plan (LRDP) that sets forth concepts, principles, and plans to guide future growth of that campus. In November 2014, the Regents of the University of California (Regents) adopted the 2014 LRDP for the San Francisco campus, which outlines projected development levels and patterns for UCSF at all of its main campus sites through the year 2035. The 2014 LRDP Final EIR (FEIR) was certified by the Regents in November 2014 and includes, among other things, analysis of the potential environmental impacts from then-envisioned development at the Parnassus Heights campus site.

The Parnassus Heights campus site (Parnassus Heights, or campus site) is the oldest and largest of the UCSF campus sites. The facilities at Parnassus Heights are aging and the site as a whole lacks a cohesive identity. Over the last 20 years, UCSF has invested billions of dollars into acquiring, developing, and supporting its Mission Bay campus site, without commensurate investment in Parnassus Heights. UCSF's investment in Parnassus Heights has not kept pace with its aging facilities or changes in programmatic need, resulting in infrastructure, buildings, and interior spaces that require substantial renewal and investment.

Since the adoption of the 2014 LRDP and certification of the 2014 LRDP FEIR, UCSF undertook a planning process to re-envision and revitalize Parnassus Heights as a whole, to integrate UCSF's clinical, educational, and research missions in ways that promote collaboration and synergies in the UCSF Parnassus Heights campus community. The planning process resulted in the development of the Comprehensive Parnassus Heights Plan (CPHP, or Plan), which provides a long-term development framework for the revitalization of the Parnassus Heights physical environment, and is intended to ensure that a modernized Parnassus Heights enhances UCSF's status as an anchor institution in San Francisco.

The proposed CPHP is subject to review under the California Environmental Quality Act (CEQA). UCSF is serving as the Lead Agency under CEQA for the proposed CPHP. This Initial Study, and forthcoming EIR, respectively, has been and will be prepared in accordance with CEQA to analyze potential environmental impacts that could result from implementing the CPHP. The CPHP EIR will be a program-level EIR that programmatically analyzes the environmental impacts of the CPHP which is envisioned to be completed by horizon year 2050. The CPHP EIR also will provide project-level analyses of specific near-term projects proposed for the initial phase of CPHP implementation that are planned for completion by approximately 2030. This EIR will analyze the CPHP proposals based on the level of information available for each project at the time of preparation of this EIR.

Because the CPHP proposes to modify the Parnassus Heights development plans identified in the 2014 LRDP, an amendment of the 2014 LRDP is proposed.

UCSF has also begun to plan the New Hospital at Parnassus Heights (NPH or New Hospital) and is projecting the need for a larger hospital than was planned in the 2014 LRDP. The planning, design and construction of a new, world-class hospital at Parnassus Heights would ensure that UCSF can continue to provide premier care to patients in the San Francisco Bay Area and beyond in the 21st century. Although parameters for the New Hospital project (location, size, projected population) are accounted for in the CPHP and will be analyzed at a program level in the Draft EIR, the New Hospital represents a major project for UCSF and many details of the New Hospital are still being developed. Therefore, the New Hospital will be the subject of a subsequent project-specific environmental review separately from the CPHP when more details become available.

2.2 Campus Site Location and Existing Site Characteristics

Figure 1 presents an aerial of the Parnassus Heights campus site location and vicinity. The Parnassus Heights campus site is located in the Inner Sunset mixed-use neighborhood in San Francisco, bounded by Carl and Irving Streets to the north; Third Avenue and Fifth Avenue to the west; and Clarendon Avenue, Christopher Drive, and Crestmont Drive to the south. The campus site's east boundary abuts the Cole Valley neighborhood and the City's Interior Greenbelt Natural Area.

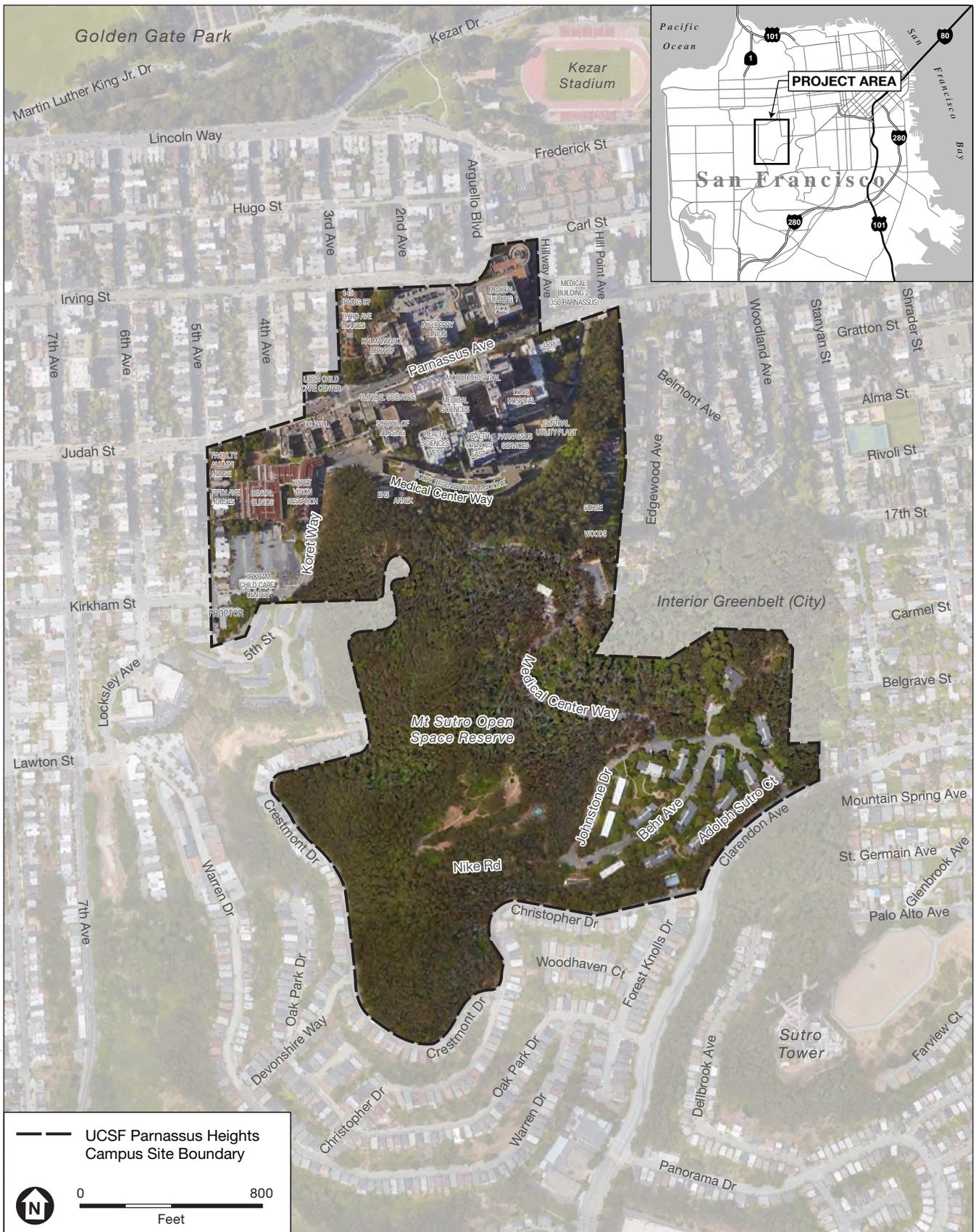
The irregularly-shaped campus site comprises 107 acres. UCSF's facilities are concentrated at the north end of the campus site, where Moffitt and Long Hospitals, four professional schools, clinics, research, housing, parking, and other support uses are located. The 61-acre Mount Sutro Open Space Reserve (Reserve) occupies the central and southern portion of the campus site. The Aldea Housing complex is located in the southeast portion of the campus site adjacent to the Reserve.

The current average daily population at Parnassus Heights is estimated at approximately 17,400 persons, including faculty and staff, students, patients, and visitors. There are currently nearly 7,400 UCSF faculty and staff employed at the campus site. About 580 residents currently reside in UCSF housing at the Parnassus Heights campus site.

2.3 Relationship of CPHP to 2014 LRDP

The 2014 LRDP serves as a comprehensive physical land use plan and policy document to guide the physical development of the San Francisco campus, accommodating future increases in enrollment and academic and research activities at UCSF and meeting its projected educational and research demand. The existing 2014 LRDP accommodates development anticipated to occur by horizon year 2035. The 2014 LRDP contains objectives to guide decisions for future facilities to meet demands and projects the quantities and uses of new building space needed during this time frame.

Because the CPHP proposes to modify the Parnassus Heights development plan identified in the 2014 LRDP, an amendment of the 2014 LRDP is proposed. The proposed LRDP Amendment would revise those portions of the 2014 LRDP pertaining to Parnassus Heights to incorporate concepts and proposals identified in the CPHP. Proposed changes would include revisions to



SOURCE: Google Earth, 2019; ESA, 2019

UCSF Comprehensive Parnassus Heights Plan EIR

Figure 1
Parnassus Heights Campus Site Location and Vicinity



functional zones; revisions to the space program, update to estimated population; revisions to existing planning agreements, including revisions to the Regents' Resolution, and an update to the Greenhouse Gas Reduction Strategy.

If the CPHP is approved by the Regents and the 2014 LRDP is amended, the CPHP would become the primary planning document for Parnassus Heights and would be used by UCSF to guide the development of the campus site through the next 30 years, or an approximate horizon year of 2050. Nevertheless, all other UCSF campus sites addressed by the UCSF 2014 LRDP would continue to have an approximate horizon year of 2035.

2.4 CPHP

CPHP Features

The CPHP establishes a long-term development framework for the revitalization of the physical environment at Parnassus Heights, by identifying the following:

- Opportunity sites for new buildings and major renovations of existing buildings;
- Candidate buildings for demolition;
- Opportunities for development of open spaces; and
- Opportunities for improvements to on-campus mobility and circulation.

In total, the CPHP provides for development of approximately 2.9 million gross square feet (gsf) of new building space at Parnassus Heights. When accounting for existing campus site development; demolition that was approved under the 2014 LRDP but yet not implemented, and potential additional building demolition that would occur under the CPHP, the total amount of campus space upon full implementation of the CPHP would be approximately 6.0 million gsf, including instruction, research, clinical, and support space; housing; and structured parking.

The CPHP includes an “Initial Phase” that primarily comprises: 1) Irving Street Arrival improvements, 2) Research and Academic Building (RAB), 3) New Hospital and 4) initial Aldea Housing Densification. The Initial Phase would account for approximately 1.4 million gsf of new building development, and is anticipated to be completed by approximately year 2030. Beyond the Initial Phase, the “Future Phase” encompasses the remaining approximately 1.5 million gsf of new building development described in the CPHP, and is envisioned for completion by the horizon year of 2050.

A program EIR will be prepared for the CPHP that will establish a framework for tiered or project-level environmental documents that would be prepared in accordance with the overall program. Accordingly, the EIR will provide a program-level analysis of the environmental impacts from the development of the entire space program under the CPHP, and identify Plan-level mitigation measures to reduce potential significant effects of the CPHP. In addition, the EIR will include project-level analysis for the following CPHP Initial Phase developments: Irving Street Arrival, RAB, and initial Aldea Housing Densification. The analysis of these Initial Phase development proposals at the project-level is intended to provide sufficient detail permit to permit project approval and implementation following certification of the CPHP Final EIR. The fourth CPHP

Initial Phase project – the proposed New Hospital – will be analyzed at a program level in this EIR, but because it represents a major project for UCSF, it will undergo additional project-level environmental review separately from the CPHP when more details become available. Similarly, when details on CPHP Future Phase projects are known, each Future Phase project would be reviewed in light of the CPHP Final EIR to determine the appropriate level of additional environmental review, if any, needed before approval and implementation of the particular project.

Opportunity Sites for New Development

Opportunities for new development under the CPHP include:

- New construction of clinical, educational, research, and housing facilities on opportunity sites throughout the campus (see **Figure 2**);
- Additional housing development at the Aldea Housing site;
- Open space enhancements throughout the campus, most notably the Millberry Terrace, the expansion of Saunders Court, and the Promenade to the south of the current UC Hall;
- Extension of Fourth Avenue as a campus street between Parnassus Avenue and Kirkham Street;
- Development of a service and utility corridor at the back of the campus to connect Medical Center Way to Koret Way and the proposed extension of Fourth Avenue;
- Public realm improvements, including within the campus core (along Parnassus Avenue generally between Fifth Avenue and Medical Center Way); and
- Development of a bridge across, and tunnel beneath, Parnassus Avenue associated with the New Hospital.

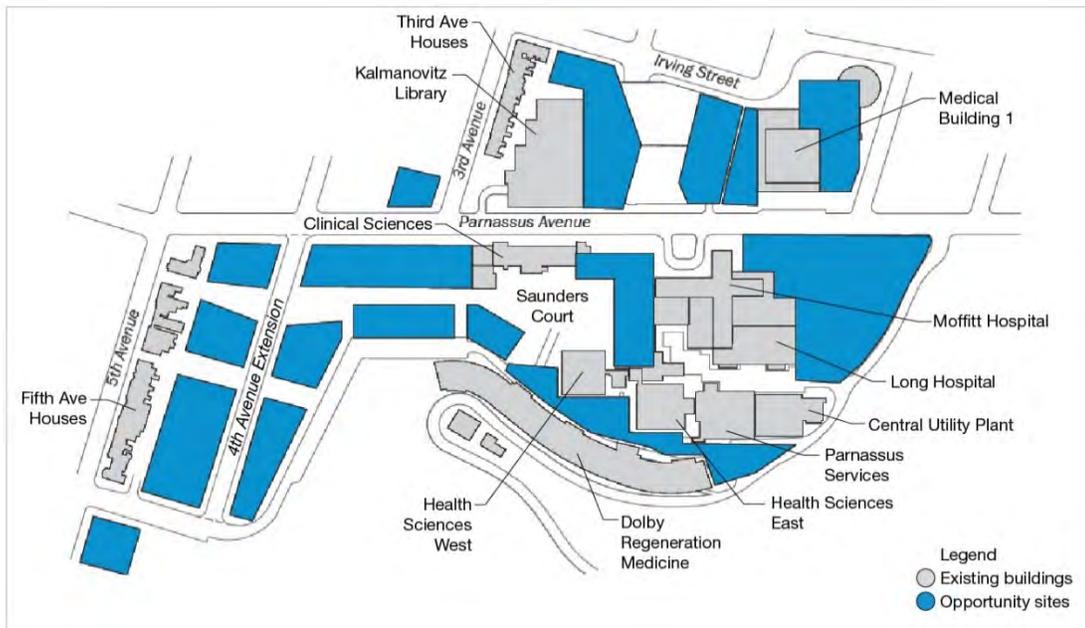


Figure 2
CPHP Opportunity Sites in Campus Core

Redevelopment under the CPHP would entail demolition of structures beyond those identified in the 2014 LRDP, to make way for new buildings (see **Figure 3** for an illustration of potential demolitions within the campus core). Demolitions to occur as part of the CPHP may include UC Hall, Dental Clinics, School of Nursing building, Millberry Union and Garage (either wholly or partially), Lucia Child Care Center, Kirkham Child Care Center, and all of the residential structures of the Aldea Housing complex.

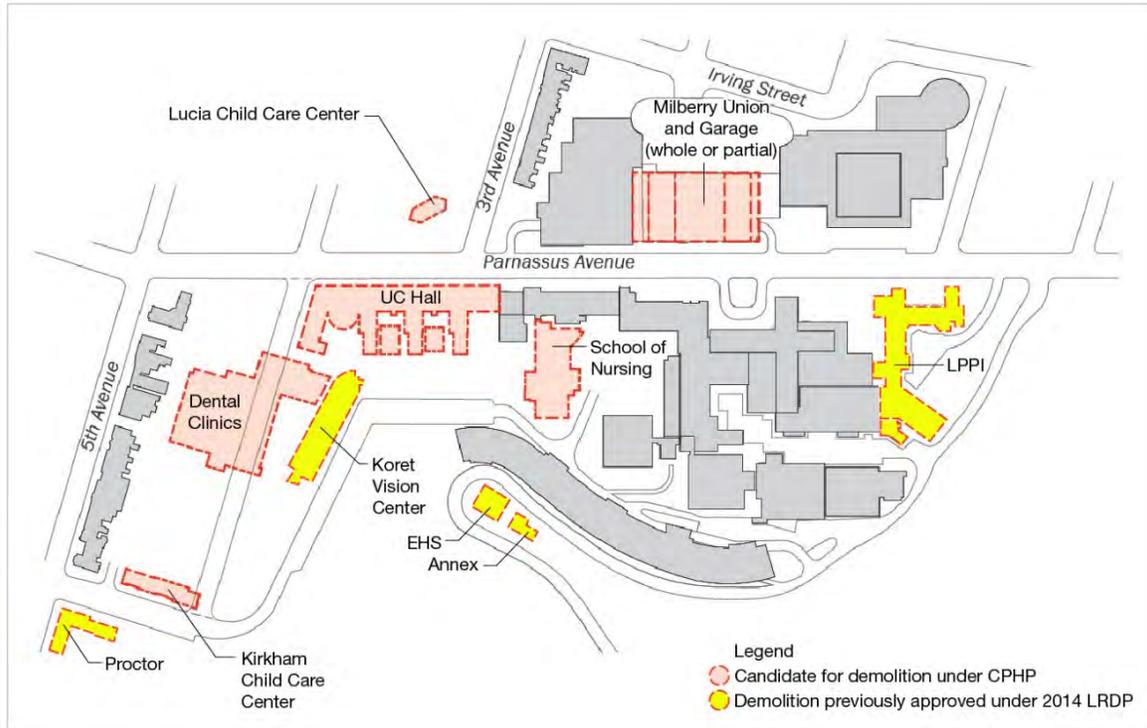


Figure 3
Potential Demolitions in Campus Core

There is the potential for certain new development under the CPHP to result in the need to modify the Reserve boundary. UCSF proposes to replace any area of the Reserve that is lost due to new development under the CPHP by designating new Reserve area elsewhere on the campus site in an amount equal to or greater than that area lost.

CPHP Initial Phase

Figure 4 identifies the location of each of the Initial Phase developments.

Irving Street Arrival

The proposed Irving Street Arrival includes modification of the portion of the existing Medical Building 1 in order to develop a new and/or reconfigured multi-story vertical circulation space to include express elevators or escalators, stairs, and arrival features such as information and orientation areas (the “unified lobby”). The new/modified structure would be about 25,000 gsf, and include an additional two stories on the Irving Street side (increasing to a total of 8 stories

and up to 86 feet in height) and an additional two stories on the Parnassus Avenue side (increasing to a total of three stories and up to 45 feet in height). The Irving Street Arrival project would also include replacing the facades or reskinning of the Millberry Union and Medical Building 1 garage structures.

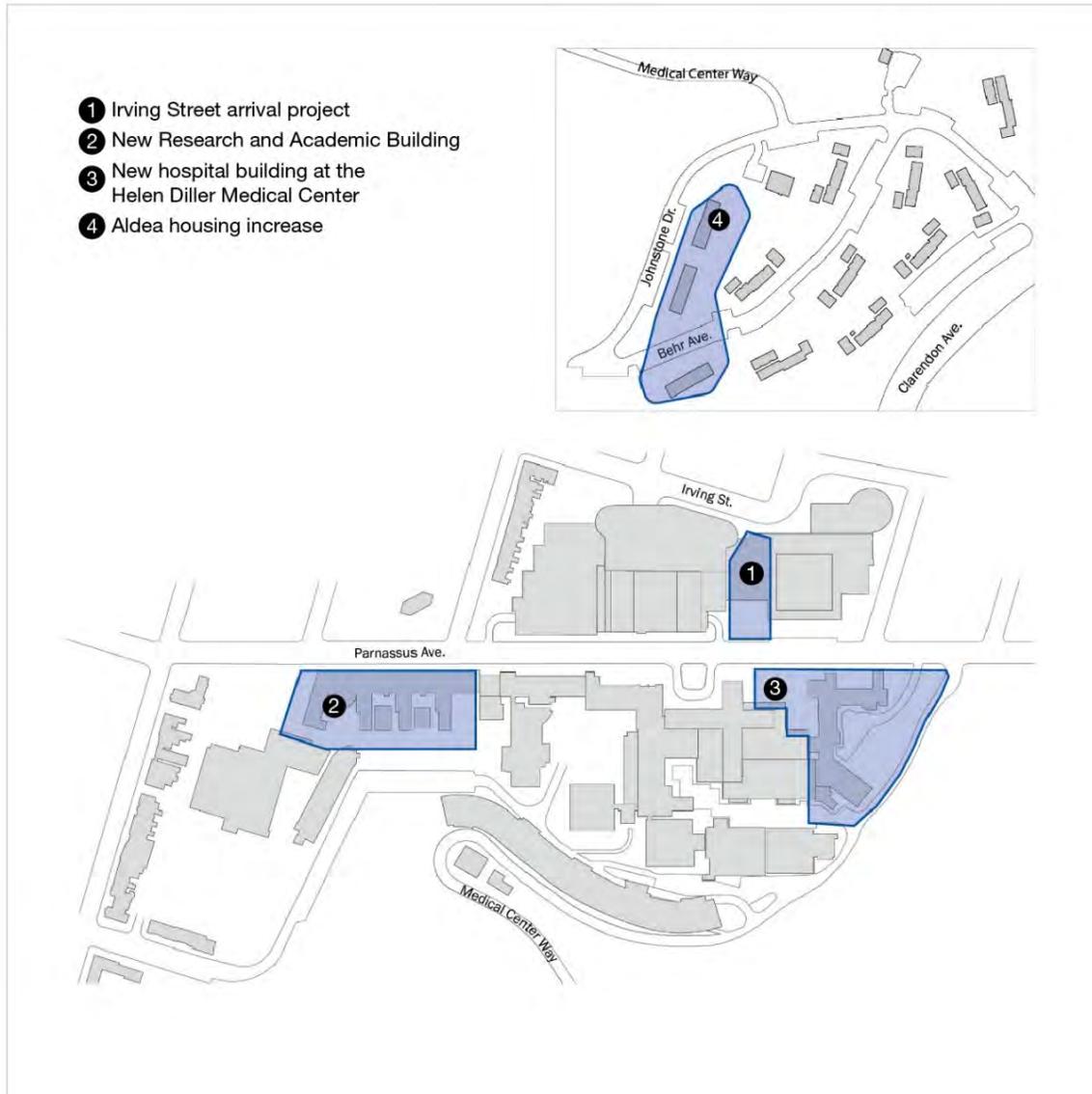


Figure 4
CPHP Initial Phase Projects

Research and Academic Building

The proposed RAB would be located on the current site of UC Hall, following the proposed demolition of this building. UC Hall is potentially eligible for the National Register of Historic Places and the California Register of Historic Resources, although is not currently formally nominated for either register. The School of Nursing building would also be demolished as part of this Initial Phase project.

The proposed RAB would be approximately 270,000 gsf and eight stories tall (up to 130 feet in height), and would contain primarily research and education space. Development of the RAB site could also include components of the CPHP intended to be constructed incrementally that are adjacent to the RAB site, such as a portion of the promenade, the service/utility corridor to the south of the RAB site, and the first increment of Fourth Avenue extension to the west of the RAB site.

New Hospital, and Bridge and Tunnel Across Parnassus Avenue

The proposed New Hospital would be located on the site of LPPI on the south side of Parnassus Avenue between Medical Center Way and Moffitt Hospital. As currently proposed, the New Hospital would be about 955,000 gsf, and 16 stories tall (up to 294 feet in height).¹ The New Hospital would have the capacity for approximately 384 inpatient beds. The portion of Medical Center Way adjacent to the New Hospital site would be widened for fire safety purposes. The widening of Medical Center Way and the New Hospital footprint are projected to result in the need to modify the Reserve boundary. As indicated above, UCSF would replace any area of the Reserve that is lost due to new development under the CPHP by designating new Reserve area elsewhere within the campus site.

To facilitate pedestrian safety, ease of crossing Parnassus Avenue, and patient transport, a pedestrian bridge over Parnassus Avenue is proposed connecting the New Hospital to the Irving Street Arrival. A tunnel beneath Parnassus Avenue connecting the south side of the campus to the north side is also proposed. The tunnel is intended for pedestrians, utility lines, and the movement of goods and materials, to reduce the amount of activity and congestion that occurs on Parnassus Avenue and to provide a safer crossing experience for patients, visitors, employees, and students.

Initial Aldea Housing Densification

The CPHP envisions densification of the Aldea Housing site by demolishing the existing student housing structures, and constructing student housing in new buildings, in the approximate location of existing building foundations. In this initial phase, the three existing 3-story 1960s-era housing structures (individually eligible for the CRHR and NRHP) at Aldea would be replaced with three 8-story housing structures (up to 96 feet in height) and one 5-story housing structure (up to 60 feet in height), increasing the number of dwelling units by 142 units (i.e., from 42 existing units to a proposed 184 units).

Other Improvements

Utility Improvements

A proposed multi-level service corridor would extend from roughly Medical Center Way to Koret Way and the new extension of Fourth Avenue to facilitate transport of goods and materials for

¹ Excluding potential rooftop design features, observation deck, elevator vestibule and roof top mechanical that would occupy a portion of the roof, and that would consist of about 5% to 7% of the height of the New Hospital. This will be analyzed in more detail in the EIR for the New Hospital. As currently conceived, the majority of mechanical equipment would be contained within various levels of the New Hospital to minimize the amount of equipment located on the roof.

back-of-house functions and to provide easy access to major utility lines serving the campus. Utilities anticipated in the service corridor include steam, chilled water, condensate return pipes, domestic and fire water, electrical and communications. In addition, additional emergency and domestic water storage, and emergency sewer effluent storage, is proposed at the campus site.

In addition, existing utilities in the vicinity of the New Hospital site would be modified or relocated, including at the existing site of the ammonia tank at Parnassus Avenue near Medical Center Way, to enhance functionality of utilities serving the campus site and to improve aesthetics along Parnassus Avenue.

Parnassus Avenue Streetscape Plan

The 2014 LRDP FEIR analyzed the Parnassus Streetscape Plan, a proposal that called for improvements along Parnassus Avenue generally between Fifth Avenue and Medical Center Way. Slight modifications to the Parnassus Avenue Streetscape Plan would be made to conform to new development proposals that front Parnassus Avenue.

Renovation of Existing Buildings

The CPHP identifies opportunity sites for building renovations (i.e., separate from those buildings identified in the CPHP as opportunity sites for demolition and new construction). Opportunity sites for notable renovations include the HSIR Towers and the Medical Sciences Building.

Cushioning Actions

UCSF may voluntarily propose improvements to public streets or other public realm areas that, while not considered mitigation measures under CEQA, may nonetheless improve operations or otherwise enhance conditions at those locations.

CPHP Future Phase

The CPHP Future Phase comprises all remaining development opportunities identified under the CPHP. Potential development includes the following:

Millberry Union New Towers and Terrace

The CPHP envisions redevelopment of Millberry Union by demolishing the existing Millberry Union towers and constructing a larger facility of about 260,000 gsf. The two new towers that would flank a new terrace would be five stories (approximately 64 feet in height) as measured from Parnassus Avenue; and eight stories (up to 86 to 90 feet in height) along Irving Street. The new building could contain clinical, instruction, and research space, as well as campus community space.

It is possible that in order to construct the facility, the existing Millberry Union would need to be demolished in its entirety, depending on the seismic condition of the building, cost, and other factors at the time the proposal is implemented. It is also possible that the Millberry Union garage, upon which Millberry Union sits, would need to be reconstructed in order to support the new structure.

Hotel for Patients and Families

The CPHP envisions the demolition of the existing Lucia Child Care center and the construction of a 48,000 gsf hotel to provide lodging for both patients and families of patients who are staying at the hospital for an extended period. The Plan envisions a building of about three stories and up to 53 feet in height. A nominal amount of parking could be constructed on this site.

New Program Adjacent to RAB

The CPHP identifies opportunities for future development behind the future RAB on a site that is largely vacant except for a small storage and loading area. The CPHP also identifies opportunities for future development to the southwest of the RAB, which would necessitate demolition of the Koret Vision Center building and Dental Clinics building. Future uses in these new spaces, which would total about 582,000 gsf, would include primarily research and academic space. The buildings would range from three to nine stories (up to 45 to 130 feet in height). The existing Faculty Alumni House as well as UCSF-owned housing along the east side of Fifth Avenue would remain.

West Side Housing

The CPHP includes the development of new housing for students and staff to address the pressing need for affordable housing in San Francisco, which has reached crisis levels. Approximately 281,000 gsf of new housing within the West Side district would be located on both sides of the proposed Fourth Avenue extension. Approximately 430 units of housing are proposed. The structures would range from approximately six to ten stories up to 72 to 120 feet in height, and would step down (east to west) along the slope.

Development on the site would require demolition of the Kirkham Child Care center and the West Side Parking Lot. Parking spaces lost from demolition of the West Side Parking Lot and from alterations of the Millberry Union garage would be replaced at the West Side Housing site.

Child Care on Proctor Site

The CPHP envisions that the Proctor building would be demolished and replaced with a new three-story, up to 35-foot tall childcare facility of about 35,000 gsf. An outdoor play area, a nominal amount of on-site parking, and a drop-off area would be included.

Future Phase of Aldea Housing

In the Future Phase, the remaining nine 3-story existing housing structures in the Aldea complex would be replaced with eight 5-story housing structures (up to 60 feet in height), increasing the number of dwelling units in this phase by 190 units). A small daycare center of about 15,000 gsf is also proposed within the complex under the CPHP.

Open Space

The Plan envisions an increase in the amount of usable open space on campus. The most notable of these spaces include the Millberry Terrace, to be located atop the altered or new Millberry Union garage; an expansion of Saunders Court; and the proposed Promenade, to be located to the

west of Saunders Court and south of the RAB. The Plan also indicates potential additional pathways leading to the Mount Sutro Open Space Reserve. As part of providing a visual and physical connection to open spaces such as Saunders Court and the Promenade, as well as to the pathways to the Reserve, the façade of the Medical Sciences Building could be altered.

Utilities and Infrastructure

Additional domestic and emergency water, waste wastewater/stormwater, electric and natural gas, heating and chilled water, and/or telecommunications utility improvements would occur throughout the campus site to accommodate Future Phase development, including but not limited to, utility improvements to serve the proposed Future Phase development on the west side of the campus core, and Future Phase Aldea Housing development. In addition, existing utilities in the vicinity of the New Hospital site would be modified or relocated, including at the existing site of the ammonia tank at Parnassus Avenue near Medical Center Way, to enhance functionality of utilities serving the campus site and to improve aesthetics along Parnassus Avenue.

Circulation, Transportation and Parking

As mentioned above, the Plan envisions the extension of Fourth Avenue as a campus street between Parnassus Avenue and Kirkham Street. The extension of Fourth Avenue would serve as the main access point for future new buildings to the west of the proposed RAB, including the new housing structures on the West Side.

2.5 Revisions to the 2014 LRDP

Proposed LRDP Amendment No. 6 would revise those portions of the 2014 LRDP pertaining to Parnassus Heights to incorporate concepts and proposals identified in the CPHP. Proposed changes would include the following:

- Revisions to functional zones
- Revisions to the space program
- Update to estimated population
- Revisions to Regents' Resolution
- Update to Greenhouse Gas Reduction Strategy

Revised Functional Zones

Each primary campus site identified in the 2014 LRDP includes a functional zone map reflecting the plans for predominant land uses. The functional zone map would be amended to be consistent with the districts proposed in the CPHP.

Revised Space Profile

The LRDP amendment would increase the future buildout space program at Parnassus Heights from the currently approved 3.61 million gsf (excluding housing) in horizon year 2035 to approximately 5.05 million gsf (excluding housing) in horizon year 2050, a net increase of

approximately 1.44 million gsf. When compared to the existing (2019) space developed at the campus site (approximately 3.68 million gsf, excluding housing), the proposed LRDP amendment would result in a net increase in the space program by approximately 1.37 million gsf (excluding housing) by 2050.

Updated Population Estimates

The LRDP amendment would result in an increase in the estimated average daily population from approximately 18,500 in horizon year 2035 to about 25,300 in horizon year 2050, a net increase of approximately 6,800. When compared to the existing (2018) average daily population at the campus site (approximately 17,400), the proposed LRDP amendment would result in a net increase in the average daily population by nearly 7,900 by 2050 (approximately 74 percent of which would occur in the Initial Phase).

Revisions to Regents' Resolution

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

- Reaffirm continuing commitments, including 1) maintaining the designation of the Mount Sutro Open Space Reserve as permanent open space, potentially including an adjustment to the Reserve boundary while maintaining a minimum of 61 acres in the Reserve; 2) continuing to respect the Parnassus Heights campus boundary established in 1976; and 3) continuing to adhere to the expansion restriction area within which UCSF would not acquire property or lease residential property.
- Increase the space ceiling limit from the current 3.55 million gsf to a proposed 5.05 million gsf, excluding housing (an increase of approximately 1.5 million gsf above the current space ceiling limit) in recognition of the tremendous need for program space in order for UCSF to retain its leadership position in patient care, research, and education.

Update to Greenhouse Gas Reduction Strategy

The 2014 LRDP included a UCSF Greenhouse Gas Reduction Strategy (GHGRS) to ensure that the LRDP is implemented in alignment with UC Sustainable Practices Policy, and to fulfill the GHG reduction requirements of the State of California Assembly Bill 32 (AB 32): the California Global Warming Solutions Act of 2006. Proposed LRDP Amendment No. 6 includes an update to the GHGRS which incorporates emissions generated by CPHP construction and operations.

3. Environmental Factors Potentially Affected

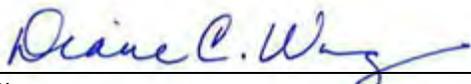
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

4. Determination

On the basis of this initial study:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



 Signature

January 14, 2020

 Date

5. Evaluation of Environmental Effects

Appendix G of the CEQA Guidelines provides a suggested format to use when preparing an Initial Study. The Environmental Checklist used in this document adopts a different format while still addressing the Appendix G checklist questions for each environmental issue area.

The attached Environmental Checklist uses the following response headings to identify potential environmental effects that will be addressed in the CPHP EIR:

1. **Impact to be Analyzed in CPHP EIR:** An effect that may or may not be significant that will be addressed in the CPHP EIR. The effect may be a less-than-significant impact that will be addressed to provide a more comprehensive analysis; an impact for which further analysis is necessary or desirable before a determination about significance can be made; an impact that is potentially significant but may be reduced to a less-than-significant level with the adoption of mitigation measures; or an impact that may be significant and unavoidable. The CPHP EIR will programmatically analyze the environmental impacts of the proposed CPHP which is envisioned to be completed by horizon year 2050. The CPHP EIR will also provide project-level analyses of specific projects proposed for the initial phase of CPHP implementation.
2. **No Additional Analysis Required:** Implementation of the proposed CPHP or a specific project under the initial phase of the CPHP would clearly result in no impact or result in a less-than-significant impact under CEQA criteria, no analysis beyond that provided in this Initial Study is necessary.

The 2014 LRDP FEIR analyzed the impacts of the planned growth and development at the Parnassus Heights campus site under the 2014 LRDP at a program level. It also included a project-level analysis for a number of specific projects, and those projects were approved for implementation at the time the 2014 LRDP was approved.

The CPHP is a revised plan for the Parnassus Heights campus site, and includes a larger development program for the campus site than previously analyzed in the 2014 LRDP FEIR with a longer time horizon under which the envisioned development program would be implemented. The CPHP excludes some of the specific projects that were previously approved in the 2014 LRDP as they will be implemented separately from the CPHP based upon the prior analysis and approval. If approved, the CPHP will replace the 2014 LRDP as the land use planning document for the Parnassus Heights campus site.

This Initial Study, and forthcoming EIR, analyze the potential significant environmental impacts that could result if the CPHP is approved and implemented. The CPHP EIR and its Initial Study will replace in full the program-level analysis for the Parnassus Heights campus site contained in the 2014 LRDP FEIR. As some of the information in the 2014 LRDP FEIR is still relevant and has been used to characterize existing conditions and inform the impact analysis in the CPHP EIR, including applying pertinent 2014 LRDP EIR mitigation measures to the CPHP projects, the 2014 LRDP FEIR is incorporated by reference in this EIR and its Initial Study.

5.1 Aesthetics

<u>Issues (and Supporting Information Sources):</u>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
I. AESTHETICS — Except as provided in Public Resources Code Section 21099, would the project:		
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Create wind hazards in publicly accessible areas of substantial pedestrian use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) As described in Section 2, *Project Description*, the Initial Phase projects contemplated under the proposed CPHP would range from three to eight stories (up to 45 to 130 feet) in height, with the exception of the New Hospital, which would be 16 stories (up to 294 feet in height). Future Phase projects would range in height from three to ten stories (up to 35 to 130 feet in height). Given the heights of the proposed structures, the prominent location of the Parnassus Heights campus core on the north-facing slope of Mount Sutro, and the location of the Aldea Housing area on the south-facing slope of Mount Sutro, development under the proposed CPHP would be visible from a number of distant public view locations. As a result, the CPHP EIR will consider the potential effects of the proposed development on scenic vistas.
- b) There are no state-designated scenic highways in the vicinity of the Parnassus Heights campus site. Therefore, no further study of the effects of CPHP implementation on scenic resources within a state scenic highway is necessary, and this topic will not be analyzed in the CPHP EIR.
- c) The location, height, and massing of the structures and other development contemplated under the proposed CPHP would alter the visual character of the Parnassus Heights campus site. For this reason, the potential effects of the proposed CPHP on the existing visual character and quality of the campus site and its surroundings will be evaluated in the CPHP EIR.
- d) The Parnassus Heights campus core is densely developed with multiple structures and is located in an urban environment characterized by high level of ambient nighttime illumination. Development under the proposed CPHP would increase the amount of nighttime illumination on the campus site and vicinity. In addition, building roofs, windows and other exterior building features and materials would have the potential to include reflective surfaces

and increase glare under the proposed CPHP. As a result, the CPHP EIR will consider the potential effects of light and glare from new development.

- e) The proposed CPHP would increase overall development at the Parnassus Heights campus site and consequently, would have the potential to create new shadows. Public open spaces under the control of the San Francisco Recreation and Park Department (RPD) are protected by the City's Sunlight Ordinance (Section 295 of the Planning Code). Section 295 prohibits the issuance of building permits for structures or additions to structures greater than 40 feet in height that would shade property under the jurisdiction of or designated to be acquired by the Recreation and Park Commission, during the period from one hour after sunrise to one hour before sunset. Pursuant to the University of California's constitutional autonomy, development and uses on property under the control of the University that are used in furtherance of the University's educational purposes are not subject to local land use regulation, including City of San Francisco Planning Code. Although UCSF is not subject to local standards, UCSF will strive to be consistent with the standards, where feasible.

The nearest public open spaces under control of the San Francisco RPD to the Parnassus Heights campus site are Golden Gate Park, located one block (approximately 400 feet) to the north of the campus site, Richard Gamble Memorial Park, located about five blocks or 2,000 feet to the northeast of the campus site, Grattan Playground, located approximately 1,000 feet to the east of the campus site, and the Interior Greenbelt, located adjacent to the campus site, east of the Reserve. Due in part to the height of the Parnassus Heights campus site relative to surrounding development, new development under the proposed CPHP, including the New Hospital, would cast shadow on nearby public open spaces. In addition, development under the proposed CPHP, including the New Hospital, would cast shadow on the Reserve, which is also open to the public, but not subject to the jurisdiction of RPD. Therefore, the CPHP EIR will consider the potential effects of shadow on public open space from new development under the CPHP for informational purposes.

- f) Building development under the proposed CPHP could create street-level winds that could be detrimental to pedestrians on the Parnassus Heights campus site. For this reason, the CPHP EIR will consider the potential for development under the proposed CPHP to create hazardous street-level winds in publicly accessible areas of substantial pedestrian use within the Parnassus Heights campus site.

5.2 Agriculture and Forestry Resources

<u>Issues (and Supporting Information Sources):</u>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
II. AGRICULTURE AND FORESTRY RESOURCES —		
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>		
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) No agricultural uses are located on the Parnassus Heights campus site, and no land on the campus site is designated as Important Farmland on maps prepared pursuant to the Farmland Mapping and Monitoring Program. Consequently, no impact related to conversion of agricultural land would occur under the proposed CPHP, and this topic will not be evaluated further in the CPHP EIR.
- b-c) The Parnassus Heights campus site is designated for urban uses. No portion of the campus site is zoned for agricultural use, forest land or timberland. In addition, there is no Williamson Act contract applicable to the Parnassus Heights campus site or its vicinity. Consequently, no impact related to conflicts with zoning for these lands would occur under the proposed CPHP, and these topics will not be evaluated further in the CPHP EIR.
- d) The Reserve includes a variety of vegetation, including, but not limited to, blue gum eucalyptus (*Eucalyptus globulus*), Monterey cypress (*Cupressus macrocarpa*), and Blackwood acacia (*Acacia melanoxydon*) (UCSF, 2014; UCSF, 2018). There is the potential for certain new development under the CPHP, including the proposed New Hospital and associated widening of Medical Center Way adjacent to the New Hospital, to result in on the need to modify the Reserve boundary, and therefore, may result in a loss and conversion of forest land within the Reserve to a non-forest use. UCSF proposes to replace any area of the Reserve that is lost, including forest land, due to new development under the CPHP by designating new Reserve area elsewhere on the campus site in an amount equal or greater to

that area lost. Consequently, the impact to loss or conversion of forest land would be less than significant, and this topic will not be evaluated further in the CPHP EIR.

- e) No Important Farmland or other agricultural land is present in the vicinity of the campus site. Therefore, development under the proposed CPHP would not involve any changes that could indirectly cause conversion of Important Farmland to non-agricultural use. As discussed in checklist item “d,” above, UCSF proposes to replace any area of the Reserve that is lost, including forest land, due to new development under the CPHP by designating new Reserve acreage elsewhere on the campus site in an amount equal or greater to that area lost. Consequently, the impact resulting from conversion of forest land would be less than significant, and this topic will not be evaluated further in the CPHP EIR.

References

University of California, San Francisco (UCSF). 2014. *UCSF 2014 Long Range Development Plan Final Environmental Impact Report*. November.

UCSF. 2018. *UCSF Vegetation Management Plan for the Mount Sutro Open Space Reserve Final Environmental Impact Report*. March.

5.3 Air Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
III. AIR QUALITY —		
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:		
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Exceed the LRDP EIR standard of significance by exposing receptors to toxic air contaminant emissions that (1) result in a cancer risk greater than 10 cancer cases per 1 million people exposed in a lifetime; or (2) for acute or chronic effects, result in concentrations of toxic air contaminant emissions with a Hazard Index of 1.0 or greater.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) The most recent clean air plan is the Bay Area 2017 Clean Air Plan that was adopted by the Bay Area Air Quality Management District (BAAQMD) in April 2017. Consistency with this plan is the basis for determining whether development under the proposed CPHP would conflict with or obstruct implementation of air quality plans. Development under the proposed CPHP would increase both stationary and mobile sources of air emissions, which contribute to regional air pollution. Air pollutant emissions also could occur over the short term in association with construction activities that emit exhaust and dust that could affect local and regional air quality. The CPHP EIR will include an evaluation of the potential for the proposed project to conflict with the local clean air plan.
- b) Construction and operation of development projects under the proposed CPHP would generate air pollutants that could be considerable in a regional, cumulative context. The CPHP EIR will include an evaluation of the air quality impacts that could result from pollutant emissions related to implementation of the CPHP for which the air basin is in nonattainment of the ambient air quality standards.
- c, e) Construction and operation of development under the proposed CPHP could expose sensitive receptors on the campus site and in adjacent residential neighborhoods to substantial pollutant concentrations (including toxic air contaminants). The CPHP EIR will include an evaluation of the air quality impacts related to exposure of sensitive receptors to pollutant concentrations.
- d) The proposed CPHP would not include development of land uses identified by BAAQMD as typically associated with odors, such as wastewater treatment plants, landfills, composting facilities, refineries, or chemical plants (BAAQMD, 2017). As the proposed CPHP would

not result in development that would be a potential source of odors, this topic will not be evaluated further in the CPHP EIR.

References

Bay Area Air Quality Management District (BAAQMD). 2017. *California Environmental Quality Act Air Quality Guidelines*. May.

5.4 Biological Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
IV. BIOLOGICAL RESOURCES — Would the project:		
a) 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 Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) 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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Exceed the LRDP EIR standard of significance by damaging or removing heritage or landmark trees or native oak trees of a diameter specified in a local ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) Construction and operational activities under the proposed CPHP that would be within or in the vicinity of the Reserve have the potential to adversely impact special-status wildlife species migratory birds, and bats inhabiting the Reserve forest through increased noise and visual disturbance. In addition, resident and migrating birds and bats could nest or roost in buildings within the Parnassus Heights campus site. Demolition of existing structures on the campus site, or removal of campus trees or other vegetation could result in the loss of nests or roosts, and construction of individual projects under the proposed CPHP could adversely impact resident and migratory birds or bats through increased noise and visual disturbance during building construction. These potential impacts will be analyzed and discussed further in the CPHP EIR.
- b) Development under the proposed CPHP would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS as no riparian habitat or other sensitive natural community is mapped or identified within the campus site. While there is the potential for certain new development under the CPHP, including the proposed New Hospital and associated widening of Medical Center Way adjacent to the New Hospital, to result in the need to modify the Reserve boundary, the Reserve is largely comprised of non-native eucalyptus forest with a non-native understory (UCSF 2014; UCSF, 2018). No development under the proposed CPHP is planned within undeveloped areas of the Reserve where sensitive habitats are present; thus, there would be no impacts on riparian or sensitive

habitats. No impact would occur, and this topic will not be evaluated further in the CPHP EIR.

- c) Development at the Parnassus Heights campus site under the proposed CPHP would not have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means as there are no jurisdictional or non-jurisdictional wetlands mapped or identified within the campus site. The only wetland feature on the Parnassus Heights campus site is an intermittent stream (Woodland Creek) that is located in the Reserve. The stream originates on the eastern slope of Mount Sutro and flows into the City's Interior Greenbelt to the east. However, as no development is proposed in this portion of the Reserve, this wetland feature would not be affected by development under the proposed CPHP. No impact would occur, and this topic will not be evaluated further in the CPHP EIR.
- d) The Reserve contains suitable habitat for resident and migrating birds moving along the Pacific Flyway due to its expanse of mature trees and dense understory isolated within an urban setting. In addition, given the heights of new structures proposed under the proposed CPHP, development under the proposed CPHP could result in an increase in bird collisions with buildings on the campus site. These potential impacts will be analyzed and discussed further in the CPHP EIR.
- e) Pursuant to the University of California's constitutional autonomy, development and uses on property under the control of the University that are in furtherance of the University's educational purposes are not subject to local land use regulation, including City of San Francisco General Plan policies regarding the protection of urban biological resources. Although UCSF is not subject to local standards, UCSF will strive to be consistent with the standards, where feasible. Potential conflicts of any off-site improvements that may occur under the CPHP with the San Francisco Urban Forestry Ordinance, however, will be discussed [see topic (g), below].
- f) There are no adopted habitat conservation plans, natural community conservation plans, or other applicable habitat conservation plan that would be applicable to development under the proposed CPHP. No impact would occur, and this topic will not be analyzed in the CPHP EIR.
- g) The San Francisco Urban Forestry Ordinance (Article 16 of the San Francisco Public Works Code) was enacted to ensure the protection of trees on private land within and adjacent to public areas. The City of San Francisco currently considers street trees, significant trees, and landmark trees as protected. Significant trees are trees within 10 feet of the public right-of-way and are either 20 feet or greater in height, 15 feet or greater in canopy width, or 12 inches or greater in trunk diameter at 4.5 feet above grade. Landmark trees are trees that have received special designation by the San Francisco Board of Supervisors due to species rareness, size, age, structure, ecological contribution, or historical and cultural importance. Although development and uses on property under the control of the University that are in furtherance of the University's educational purposes are not subject to local land use

regulation, development under the proposed CPHP could affect protected trees, and the potential impact will be analyzed and discussed further in the CPHP EIR.

References

University of California, San Francisco (UCSF). 2014. *UCSF 2014 Long Range Development Plan Final Environmental Impact Report*. November.

UCSF. 2018. *UCSF Vegetation Management Plan for the Mount Sutro Open Space Reserve Final Environmental Impact Report*. March.

5.5 Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
V. CULTURAL RESOURCES — Would the project:		
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) The Parnassus Heights campus site is the oldest of the UCSF campus sites, having begun in 1896 as the Affiliated Colleges, and contains numerous buildings and structures that are listed in, or are eligible for listing in, the California Register of Historical Resources (CRHR) (UCSF, 2014). Demolition and renovation of structures proposed as part of the proposed CPHP have the potential to demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR. This potential impact will be analyzed and discussed further in the CPHP EIR.
- b) Previous studies and archival research conducted for the Parnassus Heights campus site have not identified archaeological resources at the site. Archaeological sites are generally located near watercourses or water bodies, and the Parnassus Heights campus site is not such a setting. Additionally, this campus site has been extensively modified over time, and the likelihood of discovering prehistoric archaeological resources is low (UCSF, 2014). However, given the substantial new site alteration and excavation that would occur under the proposed CPHP, the potential for uncovering archaeological resources, including historical period resources, cannot be entirely discounted. The CPHP EIR will analyze the effects of the proposed CPHP on archaeological resources.
- c) There are no known human remains, including those interred outside of formal cemeteries located at the Parnassus Heights campus site (UCSF 2014). However, the potential for uncovering human remains cannot be entirely discounted. The CPHP EIR will analyze the effects of the proposed CPHP on human remains.

References

University of California, San Francisco (UCSF). 2014. *UCSF 2014 Long Range Development Plan Final Environmental Impact Report*. November.

5.6 Energy

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
VI. ENERGY — Would the project:		
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) Construction and operation of individual projects under the proposed CPHP would require the use of refined fossil fuels, primarily gasoline and diesel. Construction activities would require the short-term use of heavy-duty construction equipment that would run on diesel fuel or electricity. Gasoline would be required primarily to fuel construction-worker automobiles to commute to and from the construction sites. Once operational, development under the proposed CPHP would generate new long-term automobile and truck trips that would require the use of gasoline and diesel fuel. Operation of the proposed CPHP development projects would also result in energy consumption that could increase the natural gas demand of the Central Utility Plant. Natural gas consumption could also increase relative to increased space heating. Potential effects related to wasteful, inefficient, or unnecessary consumption of energy resources will be analyzed in the CPHP EIR.
- b) Individual projects under the proposed CPHP would be required to comply with the *UC Policy on Sustainable Practices*, which requires that new construction meet a minimum standard of LEED-NC Silver and strive for LEED-NC Gold when possible and requires 20 percent better energy performance than Title 24 (and strives to achieve 30 percent). While new development under the proposed CPHP is not expected to conflict with the University's policy, this potential impact will be analyzed in the CPHP EIR.

5.7 Geology and Soils

<u>Issues (and Supporting Information Sources):</u>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
VII. GEOLOGY AND SOILS — Would the project:		
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:		
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Exceed the LRDP EIR standard of significance by exposing people to structural hazards in an existing building rated Level V (Poor), or Level VI (Very Poor), under the University's seismic performance rating system, or substantial nonstructural hazards?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a.i) The Parnassus Heights campus site is located on a bedrock outcrop of the Franciscan Complex, a mix of chert, greenstone, meta-sandstone and shale. The Parnassus Heights campus site is not located within or immediately adjacent to an active fault trace (i.e., Alquist-Priolo Earthquake Fault zone) and as a result is considered to have a very low potential for fault rupture (Jennings, 2010). No impact would occur, and this topic will not be analyzed in the CPHP EIR.
- a.ii) The entire City of San Francisco, including the Parnassus Heights campus site, is located in a very seismically active area with a high probability of experiencing a substantial earthquake in the future. Development under the proposed CPHP could put people or structures at risk of loss, injury, or death involving strong seismic ground shaking. The CPHP EIR will assess the potential for the proposed CPHP to directly or indirectly cause substantial adverse effects resulting from strong seismic ground shaking.
- a.iii) The Parnassus Heights campus site is mapped as having a low risk of liquefaction from seismic ground shaking (ABAG, 2019). However, development under the proposed CPHP could expose people or structures to loss, injury, or death due to seismic-related ground

failure, including liquefaction. The CPHP EIR will assess the potential for the proposed CPHP to directly or indirectly cause substantial adverse effects resulting from seismic-related ground failure.

- a.iv) A number of sites within the Parnassus Heights campus site have the potential for future slope movement (Rutherford & Chekene 2019). As a result, development under the proposed CPHP could result in exposure of persons or structures to loss, injury, or death due to landslides. The CPHP EIR will assess the potential for the proposed CPHP to directly or indirectly cause substantial adverse effects resulting from landslides.
- b) Development under the proposed CPHP could potentially change drainage patterns that could lead to substantial soil erosion or the loss of topsoil. The CPHP EIR will assess the potential for the proposed CPHP to result in substantial soil erosion and loss of topsoil from land development activities.
- c) The Parnassus Heights campus site is located on geologic units and soils that could become unstable as a result of land development activities under the proposed CPHP. The CPHP EIR will assess the potential for the proposed CPHP to result in substantial harm due to geologic and soil instability, including on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse.
- d) Expansive soils are defined as those that shrink when dry and swell when moist; they typically contain a high proportion of clay particles. In general, expansive soils are commonly addressed in the evaluation of onsite geotechnical hazards, and past geotechnical investigations at the campus site has not revealed the presence of expansive soils. Furthermore, the University requires all new facilities to adhere to the current California Building Code (CBC), which includes detailed provisions to ensure that the design of new facilities is appropriate to site soil conditions, including requirements to address expansive and otherwise problematic soils. With adherence to the CBC, impacts related to site soil conditions – including but not limited to expansive soils, if any are present – would be less than significant, and this topic will not be evaluated further in the CPHP EIR.
- e) The proposed CPHP does not propose any activities that would require the utilization of septic systems or alternative wastewater disposal systems. Therefore, there are no anticipated adverse effects from wastewater disposal associated with development under the proposed CPHP and this topic will not be analyzed in the CPHP EIR.
- f) Review of geological maps and previous analysis suggests that there no unique paleontological resources or unique geologic features at the Parnassus Heights campus site, which is underlain by dune sands (UCSF, 2014). However, the potential for uncovering paleontological resources cannot be entirely discounted. The CPHP EIR will analyze the effects of the proposed CPHP on paleontological resources.
- g) None of the structures planned for renovation under the proposed CPHP would expose people to structural hazards in buildings rated Level V (Poor), or Level VI (Very Poor)

under the University's seismic performance rating system for structural hazards. No impact would occur, and this topic will not be analyzed in the CPHP EIR.

References

- Association of Bay Area Governments (ABAG), 2019. Liquefaction Study Zones and Liquefaction Susceptibility, <http://gis.abag.ca.gov/website/Hazards/?hlyr=cgsLiqZones>, accessed September 3, 2019.
- Jennings C. W. 2010. 2010 Fault Activity Map of California.
- Rutherford & Chekene. 2019. New Campus-Wide Slope Stability Risk Assessment, University of California San Francisco, Parnassus Campus, San Francisco, California. March 29.
- University of California, San Francisco (UCSF). 2014. *UCSF 2014 Long Range Development Plan Final Environmental Impact Report*. November.
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5.8 Greenhouse Gas Emissions

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
VIII. GREENHOUSE GAS EMISSIONS — Would the project:		
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a, b) Construction and operation of campus development under the proposed CPHP would generate greenhouse gas (GHG) emissions that could result in a potentially significant impact. The CPHP EIR will estimate the direct and indirect GHG emissions from development under the proposed CPHP and discuss whether the emissions would exceed the BAAQMD's recommended threshold for GHGs emitted by land use development projects. The CPHP EIR will also estimate and report GHG emissions that would be generated during construction of development under the proposed CPHP. In addition, the CPHP EIR will discuss any conflicts that development under the proposed CPHP may have with UCSF's Climate Action Plan and applicable state regulations such as Assembly Bill 32, Executive Order B-30-15, Senate Bill 350, and Senate Bill 32.
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5.9 Hazards and Hazardous Materials

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
IX. HAZARDS AND HAZARDOUS MATERIALS — Would the project:		
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) Although small quantities of hazardous materials would be used on the site of each individual project contemplated by the proposed CPHP during construction, compliance with local, state, and federal regulations would minimize risks associated with the routine transport, use, or disposal of hazardous materials. However, during operation the proposed CPHP would include an increase in research and clinical uses on the campus site that could involve the routine use, transport, or disposal of hazardous materials, including hazardous chemical, radioactive, and biohazardous materials and research animals. The CPHP EIR will evaluate potential effects that could arise through the routine transport, use, or disposal of hazardous materials during operation of campus facilities developed pursuant to the proposed CPHP.
- b) Demolition and renovation of structures under the proposed CPHP would disturb older structures and improvements where hazardous building materials such as asbestos, lead-based paint (LBP), polychlorinated biphenyls (PCBs), and mercury may be present (UCSF, 2014). If present, demolition and renovation activities could disturb these materials, thus resulting in potentially adverse effects to workers and the public. In addition, San Francisco is among the identified counties where ultramafic bedrock materials are present and have the potential for naturally occurring asbestos fibers, which could be encountered during excavation activities (UCSF, 2014). If present, groundbreaking activities could disturb these fibers causing them to become airborne, thus resulting in potentially adverse effects to workers and the public. The CPHP EIR will evaluate potential effects that could arise from the inadvertent release of hazardous materials into the environment during construction activities associated with development under the proposed CPHP.

- c) There are two child care centers currently operating within the campus site (Kirkham Child Development Center and UCSF Marilyn Reed Lucia Child Development Center). There are also several public schools (Independence High School, Grattan Elementary School and Clarendon Alternative Elementary School) and private child care centers located within a quarter mile of the Parnassus Heights campus site boundary. Demolition and replacement of the structures on the Aldea Housing complex site could result in hazardous emissions due to the presence of hazardous building materials. The CPHP EIR will evaluate potential effects that could arise due to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- d) Two cases for the Parnassus Heights campus site found on the Geotracker database maintained by the State Water Resources Control Board were closed in accordance with applicable regulatory agency oversight, with no further action required (SWRCB 2019a; SWRCB 2019b). However, given the routine use of hazardous materials on the campus site, it is possible that unknown contamination may be present on other portions of the campus site. The CPHP EIR will evaluate potential hazards to the public or the environment from potential contamination on the campus site.
- e) There are no public use airports within two miles of the City of San Francisco. San Francisco International Airport and Oakland International Airport are over eight and 12 miles from the campus site, respectively. No impact would occur, and this topic will not be discussed in the CPHP EIR.
- f) Individual projects and proposed improvements contemplated by the proposed CPHP would be required to ensure that the street system can accommodate emergency response and evacuation. All projects and improvements would be designed to ensure appropriate emergency access to and egress from all areas. Additionally, all project-specific designs, including private internal circulation and building site plans, would be subject to review and approval by the State Fire Marshall for emergency response and evacuation concerns. UCSF design criteria and existing emergency response requirements are sufficient to ensure that the potential health and safety effects resulting from possible impairment or interference with any emergency response or evacuation plans would remain less than significant, and this topic will not be analyzed in the CPHP EIR.
- g) According to CAL FIRE's Fire Hazard Severity Zone Map of San Francisco County, the Reserve is designated as Local Responsibility Area (LRA) moderate fire hazard severity zone (CAL FIRE, 2007). In September 2018, UCSF began implementing the Mount Sutro Open Space Reserve Vegetation Management Plan, a 20-year phased plan covering the management of the Reserve. Implementation of the vegetative management plan would change fire hazards and fire behavior within the Reserve, and fire hazards within the Reserve would generally decrease as a result of vegetation management activities, such as creating defensible space, removing diseased and/or dead trees, and increasing the diversity of tree types (UCSF 2018). The remainder of the Parnassus Heights campus site is not located within a fire hazard severity zone. The Vegetation Management Plan would mitigate the wildfire risk to new development under the CPHP, and consequently, the impact associated with the

exposure of people or structures developed under the proposed CPHP, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires would be less than significant. This topic will not be analyzed in the CPHP EIR.

References

- California Department of Forestry and Fire Protection (CAL FIRE). 2007. Draft Fire Hazard Severity Zones in LRA – San Francisco County. October 5.
- State Water Resources Control Board (SWRCB). 2019a. Geotracker database, <http://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=315+Parnassus+Avenue>. Accessed August 21, 2019.
- SWRCB. 2019b. Geotracker database, <http://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=50+Medical+Center+Way>. Accessed August 21, 2019.
- University of California, San Francisco (UCSF). 2018. *UCSF Vegetation Management Plan for the Mount Sutro Open Space Reserve Final EIR*. March.
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5.10 Hydrology and Water Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
X. HYDROLOGY AND WATER QUALITY — Would the project:		
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:		
i) result in substantial erosion or siltation on- or off-site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) 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; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) The majority of surface water runoff from the Parnassus Heights campus site is directed to the City's combined sewer system (CSS) that conveys flows to both the City's Oceanside Treatment Plant at Ocean Beach on the City's western shoreline and the Southeast Treatment Plant at Hunters Point on the City's eastern waterfront. Both treatment plants have a permit from the National Pollutant Discharge Elimination System (NPDES) program administered by the San Francisco Regional Water Quality Control Board (RWQCB) that regulates discharge from the plant to the Pacific Ocean. As discussed above in Section 5.7, *Geology and Soils*, development under the proposed CPHP could potentially generate surface water runoff that could lead to substantial soil erosion or the loss of topsoil during construction. Development under the proposed CPHP could also potentially generate surface water runoff with elevated levels of sediment and urban contaminants such as oil, grease, metals, pesticides, herbicides and entrained dust during operation. The CPHP EIR will evaluate potential impacts related to water quality during both construction and operation of campus development under the proposed CPHP.
- b) Portions of the Parnassus Heights campus site where development under the proposed CPHP would occur are currently under impervious surfaces. Development under the proposed CPHP could result in an increase in impervious surfaces but not enough to interfere with groundwater recharge. In addition, dewatering during construction may be required. However, dewatering activities would be temporary and would not result in a long-term lowering of the local water table. Finally, development under the proposed CPHP

would not require the use of groundwater during construction or operation. For these reasons, development under the proposed CPHP would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, and this topic will not be discussed in the CPHP EIR.

- c.i) The Parnassus Heights campus site is located within both the Sunset watershed basin which drains to the Pacific Ocean and the Channel watershed basin, which drains to the bay. Development under the proposed CPHP would primarily occur within the developed portions of the campus site. Development under the proposed CPHP would change drainage patterns on the Parnassus Heights campus site that could potentially result in erosion and siltation off-site downstream within the Sunset and Channel drainage basins. The CPHP EIR will evaluate potential impacts related to increased erosion and siltation.
- c.ii) Development under the proposed CPHP would change drainage patterns on the campus site that could potentially result in flooding on- or off-site downstream within either the Sunset or Channel drainage basins. The CPHP EIR will evaluate potential impacts related to flooding on- or off-site.
- c.iii) Development under the proposed CPHP could potentially result in additional sources of polluted runoff during demolition or construction. As discussed under item (a) above, the CPHP EIR will evaluate potential impacts to water quality from stormwater runoff.
- c.iv) An intermittent stream (Woodland Creek) is located in the Reserve. The stream originates on the eastern slope of Mount Sutro and flows into the City's Interior Greenbelt to the east. No other water features are located on the Parnassus Heights campus site. Development under the proposed CPHP would increase the amount of impervious surfaces on the Parnassus Heights campus site, which could impede or redirect flood flows. However, the proposed CPHP would not impede or redirect flood flows in Woodland Creek as no development would occur in that portion of the Reserve. The CPHP EIR will evaluate potential impacts related to the impediment or redirection of flood flows on other portions of the campus site.
- d) The campus site is not located within a 100-year flood zone (SFWPS, 2019). In addition, with an elevation ranging from 300 to 900 feet, the campus site has no potential to be affected by future sea level rise (CCSF 2016). Finally, due to its elevation and inland location, and its distance from the nearest major body of water, the campus site is not susceptible to the potential effects of a tsunami or seiche (CalEMA 2009). No impact would occur, and no additional analysis is required.
- e) Water quality in the City and County of San Francisco is regulated by the San Francisco RWQCB through the Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin. As discussed under item (a) above, development under the proposed CPHP could negatively impact water quality during construction and operation. The CPHP EIR will evaluate potential conflicts with the Basin Plan.

The project site is located in the Westside groundwater basin. The basin has not been identified as a medium- or high-priority groundwater basin by the California Department of Water Resources (DWR, 2019); therefore, a Groundwater Sustainability Plan (GSP) does not need to be prepared for the basin per the requirements of the Sustainable Groundwater Management Act (SGMA). Thus, development under the proposed CPHP would not conflict with a sustainable groundwater management plan, no impact would occur, and no additional analysis is required.

References

- San Francisco Water Power Sewer (SFWPS). 2019. 100-Year Storm Flood Risk Map, <http://www.sfwater.org/index.aspx?page=1229>. Accessed August 27, 2019.
- City and County of San Francisco (CCSF). 2016. *San Francisco Sea Level Rise Action Plan*. March.
- California Department of Water Resources (DWR). 2019. Basin Prioritization, <https://water.ca.gov/Programs/GroundwaterManagement/Basin-Prioritization>. Accessed August 28, 2019.
- California Emergency Management Agency (CalEMA). 2009. Tsunami Inundation Map for Emergency Planning, State of California – City and County of San Francisco, San Francisco North Quadrangle, San Francisco South Quadrangle (Pacific Coast). June 15.
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5.11 Land Use and Planning

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
XI. LAND USE AND PLANNING — Would the project:		
a) Physically divide an established community?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Exceed an LRDP EIR standard of significance by conflicting with local land use regulations such that a significant incompatibility is created with adjacent land uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) No development outside of the established campus boundary is proposed, and no intrusion into, or division of, surrounding residential communities would occur under the proposed CPHP. The Parnassus Heights campus site would continue to remain as a distinct entity, consisting of educational and medical land uses that are woven into the fabric of the surrounding neighborhood, and the boundary of the campus site would not change as a result of the proposed CPHP. While the extension of Fourth Avenue under the proposed CPHP would add a new roadway on the Parnassus Heights campus site, this extension would occur entirely within the campus site boundaries and would not affect the surrounding neighborhood. No impact would occur, and no additional analysis is required.
- b) The 2014 LRDP is the current applicable land use plan for the Parnassus Heights campus site through 2035. The CPHP EIR will evaluate the consistency of the proposed CPHP with the 2014 LRDP.
- c) Land within the City and County of San Francisco’s jurisdiction is subject to plans, policies and zoning controls that regulate future development proposals and mitigate certain environmental effects. UCSF is not subject to local land use regulations whenever using property under its control in furtherance of its education mission, however, the CPHP EIR will evaluate the potential for growth under the proposed CPHP to directly or indirectly conflict with City plans, policies and zoning controls such that a significant incompatibility is created with adjacent land uses.

5.12 Mineral Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
XII. MINERAL RESOURCES — Would the project:		
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a, b) The Parnassus Heights campus site is not located in an area of known mineral resources. In addition, the campus site does not contain a locally important mineral resource recovery site. Therefore, no impact would occur, and this topic will not be analyzed in the CPHP EIR.
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5.13 Noise

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
XIII. NOISE — Would the project result in:		
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Exceed an LRDP EIR standard of significance by contributing to an increase in average daily noise levels (Ldn) of 3 dB(A) or more at property lines, if ambient noise levels in areas adjacent to proposed development already exceed local noise levels set forth in local general plans or ordinances for such areas based on their use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) Development under the proposed CPHP could result in increases or changes in noise levels from sources such as construction activities, stationary sources, and increased vehicular traffic, which could exceed applicable noise standards. The CPHP EIR will evaluate the potential for development under the proposed CPHP to expose sensitive receptors to noise in excess of applicable standards.
- b) Demolition and construction activities that would occur under the proposed CPHP would generate perceptible groundborne vibration levels when heavy equipment or impact tools are used. Structures, researchers and residents in the proximity of the Parnassus Heights campus site could be adversely affected by groundborne vibration and groundborne noise generated during the construction of campus development projects under the proposed CPHP. These potential impacts will be assessed in the CPHP EIR.
- c) There are no public use airports within two miles of the City of San Francisco. San Francisco International Airport and Oakland International Airport are over eight and 12 miles from the campus site, respectively, and therefore well outside of the area of influence identified in their respective airport land use compatibility plans. Consequently, there would be a less than significant impact with regard to exposure to excessive noise levels from public use airports, and this topic will not be analyzed in the CPHP EIR.
- d) Modeled noise levels in the vicinity of the campus site are above 70 dB(A) Ldn along the Parnassus Avenue and Irving Street frontages (San Francisco 2009). While operation of individual projects under the proposed CPHP is not expected to contribute to an increase in average daily noise levels of 3 dB(A) Ldn or more at property lines in an area where ambient noise levels already exceed local noise levels set forth in City's General Plan, as that would require the projects to result in a doubling of traffic in the area, this potential impact will be analyzed in the CPHP EIR. In addition, there will likely be some new mechanical equipment (e.g. heating ventilation and air conditioning) associated with the operation of new

development on the Parnassus Heights campus site under the proposed CPHP. The potential impact of noise from these stationary sources will also be analyzed in the CPHP EIR.

References

City and County of San Francisco (CCSF). 2009. *San Francisco General Plan Environmental Protection Element*.

5.14 Population and Housing

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
XIV. POPULATION AND HOUSING — Would the project:		
a) Induce substantial unplanned 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Exceed the LRDP EIR standard of significance by creating a demand for housing outside the market area where the facilities or site are located?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) The proposed CPHP would result in population growth on the Parnassus Heights campus site through increased employment, student enrollment, patients, and visitors. The proposed CPHP would accommodate an increase in campus population from approximately 17,400 under existing conditions to approximately 25,300 by the year 2050. In addition, the proposed CPHP would increase the number of housing units in the Aldea housing complex on the campus site from 172 units to 504 units (a net increase of 332 units), and would add an additional 430 units as part of the West Side Housing project on the campus site. The CPHP EIR will evaluate the potential for the proposed CPHP to induce substantial unplanned population growth in the San Francisco Bay Area.
- b) The demolition and replacement of existing housing in the Aldea housing complex would temporarily displace UCSF residents from those residences. It is the intent of UCSF to relocate residents to alternative campus housing locations for the duration of construction. However, it is possible that alternative campus housing will not be available. As a result, the temporary displacement of Aldea housing residents may necessitate the construction of replacement housing elsewhere in the City. The CPHP EIR will evaluate the potential for the proposed CPHP to displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.
- c) The proposed CPHP would result in population growth in the San Francisco Bay Area through increased employment and student enrollment. The proposed CPHP would accommodate an increase in campus population from approximately 17,400 under existing conditions to approximately 25,300 by the year 2050. This anticipated population increase could result in an increased demand for housing in the Bay Area. The CPHP EIR will evaluate the potential for the proposed CPHP to create demand for housing.

5.15 Public Services

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
XV. PUBLIC SERVICES —		
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:		
i) Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a.i) The San Francisco Fire Department (SFFD) provides fire protection and emergency services to the Parnassus Heights campus site. The nearest fire station is Station No. 12, located about a quarter mile from the campus site at 1145 Stanyan Street. Development under the proposed CPHP would have the potential to increase the demand for fire protection services, and potentially result in the need for new or altered fire station facilities. This impact will be evaluated in the CPHP EIR.
- a.ii) The UC Police Department (UCPD) provides police protection services to the Parnassus Heights campus site. The UCPD is headquartered at 654 Minnesota Street, approximately four miles from the campus site. The UCPD also operates a patrol station at the Parnassus Heights campus site. The increase in daily population at the Parnassus Heights campus site under the proposed CPHP would increase demand on UCPD services. It is UCPD’s practice to review staffing levels and to provide necessary staffing to meet standard response times (less than 3 min for emergency/in-progress calls and less than 5 min for normal service). New staffing required to serve the increase in daily population as a result of the proposed CPHP would either be accommodated by existing facilities or within new facilities that are covered under the building space envelope being analyzed in the CPHP EIR. The UCPD also has a mutual-aid agreement with the San Francisco Police Department (SFPD) to provide cooperative assistance within a 1-mile radius of the Parnassus Heights campus site. However, the SFPD is generally only called where an unusual need for assistance is required. As a result, daily campus population growth under the proposed CPHP is not anticipated to substantially increase demand on SFPD services. For these reasons, impacts to police protection services would be less than significant, and this topic will not be analyzed in the CPHP EIR.
- a.iii) The City’s public schools are operated by the San Francisco Unified School District (SFUSD). Public schools serving the area around the Parnassus Heights campus site include Alice Fong Yu Alternative School (grades K-8) at 1541 12th Avenue, Clarendon

Alternative Elementary School (K-5) at 500 Clarendon Avenue, Grattan Elementary School (grades K-5) at 165 Grattan Street, Everett Middle School (grades 6-8) at 450 Church Street, Independence High School (grades 9-12) at 1350 7th Avenue, and Mission High School (grades 9-12) at 3750 18th Street. Development under the proposed CPHP would alter the demand for public school services and therefore this topic will be evaluated in the CPHP EIR.

- a.iv) Effects on local and regional parks are discussed in Section 5.16, *Recreation*, below.
 - a.v) Campus development under the proposed CPHP would not affect any other public facilities. No impact would occur, and this topic will not be analyzed in the CPHP EIR.
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5.16 Recreation

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
XVI. RECREATION —		
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) Several public parks are located within a quarter mile of the Parnassus Heights campus site, including Golden Gate Park, which is located one block north of the campus site. The additional campus population under the proposed CPHP would result in an increased demand for recreational facilities. This impact will be evaluated in the CPHP EIR.
- b) The proposed CPHP would result in construction of a various new recreational facilities at the campus site. This impact will be evaluated in the CPHP EIR.

5.17 Transportation

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
XVII. TRANSPORTATION — Would the project:		
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) Although UCSF is not subject to local land use regulation whenever using property under its control in furtherance of its educational mission, the CPHP EIR will evaluate the potential for development under the proposed CPHP to conflict with programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
- b) Development under the proposed CPHP would increase both the amount of building space on the Parnassus Heights campus site and the daily population, which would result in increased vehicle trips to and from the campus site. This increase in trips would in turn increase the total amount of vehicle miles traveled (VMT) to and from the campus site. The CPHP EIR will evaluate the potential for development under the proposed CPHP to conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
- c) Although development under the proposed CPHP is not expected to include hazardous roadway design features or incompatible uses, the potential for impacts related to site access will be evaluated in the CPHP EIR.
- d) Although development under the proposed CPHP is not expected to result in inadequate emergency access, this issue will be evaluated in the CPHP EIR.

5.18 Tribal Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
XVIII. TRIBAL CULTURAL RESOURCES —		
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:		
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a.i-ii) As discussed in Section 5.5, *Cultural Resources*, above, no prehistoric archaeological resources have been identified on the Parnassus Heights campus site. In addition, the likelihood of discovering intact prehistoric archaeological resources on the campus site is low as it has been extensively modified over time. For these reasons, the potential for the Parnassus Heights campus site to contain tribal cultural resources is also low. However, given the substantial site alteration and excavation that would occur under the proposed CPHP, the potential for uncovering or disturbing tribal cultural resources cannot be entirely discounted. As discussed under Section 1, *Project Information*, consistent with AB 52, UCSF contacted the applicable representatives for several local Native American tribes regarding UCSF's proposal to undertake the CPHP, however, no responses were received from the tribes. The CPHP EIR will analyze the effects of the proposed CPHP on tribal cultural resources.

5.19 Utilities and Service Systems

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
XIX. UTILITIES AND SERVICE SYSTEMS — Would the project:		
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) Development under the proposed CPHP could require or result in relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. The CPHP EIR will evaluate whether the construction or relocation of these facilities would cause significant environmental effects.
- b) The San Francisco Public Utilities Commission (SFPUC) provides regional water services to approximately 2.6 million people in San Francisco, Santa Clara, Alameda, San Mateo, and Tuolumne Counties, including all of the City and County of San Francisco. About 85 percent of the water delivered to SFPUC customers comes from the Tuolumne River watershed stored in Hetch Hetchy Reservoir in the Sierra Nevada, and the remaining 15 percent comes from runoff in the Alameda and Peninsula watersheds captured in reservoirs located in San Mateo and Alameda Counties, supplemented with local groundwater and recycled water. Development under the proposed CPHP would require additional water supplies, and the CPHP EIR will evaluate whether the SFPUC would have sufficient water supplies to serve the projected campus development under the proposed CPHP and reasonably foreseeable future development during normal, dry, and multiple dry years.
- c) The SFPUC maintains and operates the City's combined sewer system (CSS) that serves most of San Francisco, including the Parnassus Heights campus site. Wastewater generated on the Parnassus Heights campus site would enter the CSS and would be treated at the City's Oceanside Treatment Plant (only storm water generated on the east portion of the campus site would be treated at the City's Southeast Treatment Plant). Development under the proposed CPHP could result in the need for additional wastewater treatment capacity at the Oceanside Treatment Plant, and the CPHP EIR will evaluate whether the Oceanside Treatment Plant has adequate capacity to serve projected demand under the proposed CPHP in addition to current and future demands.

- d-e) Solid waste generated on the campus site is collected and hauled to a transfer station near Candlestick Point and recycled as feasible. The remaining waste is then sent to the Recology Hay Road Landfill in Solano County. The CPHP EIR will evaluate whether solid waste providers have the capacity to serve development under the proposed CPHP in addition to current and future demands. In addition, the CPHP EIR will evaluate whether the proposed project would conflict with federal, state, and local management and reduction statutes and regulations related to solid waste.
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5.20 Wildfire

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
XX. WILDFIRE — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:		
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a-d) As discussed in Section 5.9, *Hazards and Hazardous Resources*, above, the Reserve is designated as LRA moderate fire hazard severity zone by CAL FIRE. Development under the proposed CPHP would not be located in or near a state responsibility area or land classified as a very high fire hazard severity zone. In addition, with implementation of the vegetation management practices listed in the Mount Sutro Open Space Reserve Vegetation Management Plan, the risk of wildland fires on the campus site is being minimized. Finally, individual projects and proposed improvements contemplated by the proposed CPHP would be required to ensure that the street system can accommodate emergency response and evacuation. All projects and improvements would be designed to ensure appropriate emergency access to and egress from all areas. No impact would occur, and this topic will not be analyzed in the CPHP EIR.

5.21 Mandatory Findings of Significance

<i>Issues (and Supporting Information Sources):</i>	<i>Impact to be Analyzed in CPHP EIR</i>	<i>No Additional Analysis Required</i>
XXI. MANDATORY FINDINGS OF SIGNIFICANCE —		
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) As indicated in the discussions above, campus development under the proposed CPHP has the potential to result in significant biological and cultural resource impacts, and substantially degrade the quality of the environment. The CPHP EIR will evaluate the potential for development under the proposed CPHP to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
- b) The proposed CPHP would add approximately 2.9 million gsf of new clinical and academic space, support facilities, and student housing to the Parnassus Heights campus site. In addition, the proposed CPHP would increase campus population by approximately 7,900. The CPHP EIR will evaluate whether the potential impacts of development under the proposed CPHP, combined with other current projects and probable future projects and projected regional growth in the surrounding area, would be cumulatively considerable.
- c) As indicated in the discussions of each topic above, development under the proposed CPHP has the potential to result in significant impacts. The CPHP EIR will evaluate whether any of those impacts have the potential to result in substantial adverse effects on human beings either directly or indirectly.