

CITY COLLEGE OF SAN FRANCISCO

Response to Comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the City College of San Francisco Evans Center Retrofitting and Modernization and Aircraft Maintenance Technology Program Relocation

Prepared For:

City College of San Francisco
50 Frida Kahlo Way
San Francisco, California 94112

Prepared By:

Impact Sciences, Inc.
505 14th Street, Suite 900
Oakland, California 94612

November 2021

RESPONSES TO COMMENTS

1. FINAL INITIAL STUDY PROCESS

On August 23, 2021, the City College of San Francisco (College, or “District”) circulated for public review the Draft Initial Study / Mitigated Negative Declaration (IS/MND) for the City College of San Francisco Evans Center Renovation and Aircraft Maintenance Technology (AMT) Program (“Project”). A Notice of Intent was posted with the County Clerk for the City and County of San Francisco (“San Francisco County Clerk”) and distributed to interested agencies, organizations, and individuals. The District engaged in outreach to known interested parties, and circulated the draft IS/MND primarily using electronic mail to approximately 40 stakeholders and community-based organizations, agencies, and individuals. Additionally, the College posted the Draft IS/MND on its Office of Facilities and Capital Planning website (www.ccsf.edu/facilities), as well as on its Evans Center Community Forums website (www.ccsf.edu/evans-center-community-forums). The 30-day Public Review Period commenced on August 23, 2021, and was scheduled to end on September 22, 2021, at 5:00 p.m.

A virtual public Town Hall meeting was publicly noticed via the Notice of Intent and held on September 1, 2021, at 5:00 p.m., providing members of the public an opportunity to make oral comments to the District concerning the draft IS/MND for the Project.

In response to public requests, on September 21, 2021, the College issued a public notice that the 30-day Public Review Period, which commenced on August 23, 2021, to September 22, 2021, was extended until September 30, 2021, at 5:00 p.m. (“Extension Notice”). The Extension Notice was posted and distributed in the same manner as the Notice of Intent.

At the time, the District issued the Notice of Intent and the subsequent Extension Notice, it was unknown when the IS/MND and the proposed Project would be considered by the District’s Board of Trustees (“Board”). After the first extension of the Public Review Period ended on September 30, 2021, the date of the upcoming Board Meeting (December 9, 2021) where the Board would consider the IS/MND and the Project became known. While CEQA and the *CEQA Guidelines* only require a lead agency to notify commenting public agencies (and not others) of a hearing or public meeting on a project if one is subsequently scheduled after issuance of a notice of intent (14 Cal. Code Regs, section 15073(e); Pub. Res. Code, section 21092.5(b)), the District opted to pursue additional methods of public notice and outreach beyond what is required under CEQA (in addition to the public noticing requirements under the Ralph M. Brown Act). Specifically, the District elected to issue a public notice of the scheduled meeting on the proposed Project to *all* interested parties and the public at large in the same manner as the Notice of Intent and the Extension Notice.

However, pursuant to Executive Order No. N-08-21,¹ the public filing, notice, posting, and access requirements under CEQA and the *CEQA Guidelines* that were applicable after September 30, 2021, differed from the requirements that were in place prior to September 30, 2021, under Executive Orders Nos. N-54-20 and N-80-20 when the District issued the Notice of Intent and the Extension Notice. Accordingly, in order to avoid any potential confusion that could arise as a result, the District issued a Supplemental Notice of Intent on October 19, 2021 (“Supplemental Notice of Intent”), which complied with both the current filing, notice, posting, and access requirements under CEQA and the *CEQA Guidelines*, as well as the previously applicable requirements under the Executive Orders. Likewise, in efforts to further facilitate informed decision making and informed public participation in the CEQA process, the College extended the public review period for a second time, providing the public an additional 30-day period (commencing October 19, 2021, to November 18, 2021, at 5:00 p.m.) to review and comment on the draft IS/MND.

The Supplemental Notice of Intent for the second extended review period was posted with the San Francisco County Clerk, the Governor’s Office of Planning and Research (State Clearinghouse), and on the College’s Office of Facilities and Capital Planning website and Evans Center Community Forums website (see web addresses above) on Tuesday, October 19, 2021. Again, the District engaged in outreach to known interested parties, and sent the Supplemental Notice of Intent to commenting and requesting parties. The Supplemental Notice of Intent was also distributed to all 40 stakeholders that were notified during the first circulation of the document, as described above, as well as to 64 representatives of organizations, public agencies, and individuals who expressed interest during the first review period. Additionally, the Supplemental Notice of Intent was provided to schools within a quarter-of-a-mile of the proposed Project (Rise University Preparatory and Southeast Families United Mission Head Start preschool), as well as to California Native American tribes traditionally and culturally affiliated with the geographic area of the proposed Project (Amah Mutsun Tribal Band of Mission San Juan Bautista, Indian Canyon Mutsun Band of Costanoan, Costanoan Rumsen Carmel Tribe, Muwekma Ohlone Indian Tribe of the SF Bay Area, Indian Canyon Mutsun Band of Costanoan, Rumsen Am:a Tur:ataj Ohlone, Wuksache Indian Tribe/Eshom Valley Band, and The Ohlone Indian Tribe.) As noted above, the second extended review period concluded at 5 p.m. on November 18, 2021.

The District continued to make the draft IS/MND available to the public for review on the District’s public-facing website (including, the District’s Facilities and Capital Planning webpage and the Evans Center

¹ In connection with the State of Emergency declared by the Governor of the State of California in response to COVID-19, the Governor issued Executive Order No. N-54-20 on April 22, 2020, which, in relevant part, suspended and modified certain public filing, notice, posting, and access requirements under CEQA and the *CEQA Guidelines*. The suspensions/modifications were extended until further notice on September 23, 2020, via Executive Order No. N-80-20. Subsequently, the Governor established September 30, 2021, as the applicable expiration date per Executive Order No. N-08-21 (issued June 11, 2021).

Community Forums webpage), as well as, subject to COVID-19 precautions and restrictions, in person by appointment at the District’s Office of Facilities and Capital Planning (50 Frida Kahlo Way, Bungalow 606, San Francisco, CA 94112) for the duration of the second extension of the public comment period. Likewise, the draft IS/MND was distributed to the State Clearinghouse for a thirty (30) day state agency review and comment period starting on October 19, 2021, ending on November 18, 2021.

A total of 11 written comment letters were received by the College during the first public comment period (August 23, 2021, to September 30, 2021). Two additional written comment letters were received after the end of this comment period (i.e., after September 30, 2021 at 5:00 p.m.) and are also addressed herein. Two written comment letters were subsequently received by the College during the second 30-day public comment period (October 19, 2021 to November 18, 2021), and one additional written comment letter was received after the end of the second extension period (i.e., after November 18, 2021 at 5:00 p.m.), all of which are addressed herein. This document also addresses oral comments raised by eight individuals during the Town Hall meeting on September 1, 2021.

This document presents comments received during the public review periods, described above, and the District’s responses to these comments. The commenters are divided into the following categories:

1. Public Agency and Public Representative (written comments)
2. Organization (written comments)
3. Individual (written comments)
4. Town Hall Meeting (oral comments)

Table 1, List of Commenters on the Draft Initial Study, provides a list of the comment letters received in response to the Draft Initial Study.

**Table 1
List of Commenters on the Draft Initial Study**

Public Agency and Public Representative	
A-BAAQMD	Bay Area Air Quality Management District
Organization	
O-1-Greenaction	Greenaction for Health and Environmental Justice
O-2-Greenaction	Greenaction for Health and Environmental Justice
O-1-HEAT	Higher Education Action Team
O-2-HEAT ²	Higher Education Action Team
Individual	
I-Alexandra ²	Jessica Alexandra
I-Barish	Jean Barish
I-1-Bernstein ¹	Harry Bernstein
I-2-Bernstein ³	Harry Bernstein

I-Brady	Stephen Brady
I-Fuentes	Adrián Fuentes
I-Lohr	Janet Lohr
I-Madhavan	Arulselvan Madhavan
I-Righthouse	Jon Righthouse
I-Saunders	Andrew Saunders
I-Tubati ¹	Chalam Tubati
Town Hall Meeting	
TH-1	Town Hall Meeting – September 1, 2021

Note:

¹ Comments received after the end of the First Extended Review Period (i.e., after September 30, 2021, at 5 pm).

² Comments received during the Second Extension of the Review Period (from October 19, 2021, to November 18, 2021 at 5 pm.)

³ Comments received after the end of the Second Extension (i.e., after November 18, 2021 at 5 pm).

Original bracketed comment letters are presented in this document followed by the responses to each individual comment in the letters. For the purposes of identifying and responding to comments on the Draft IS, comment letters are numbered as shown in **Table 1** (top right-hand corner of the first page of each letter) and the individual comments within each letter are assigned a bracketed comment number. For example, the first comment in the comment letter from the Bay Area Air Quality Management District is labeled **Comment A-BAAQMD-1**. With respect to oral comments received at the Town Hall, a transcription of the oral comments is presented in this document, followed by the District’s response.

Unless otherwise specified, all references to the Public Review Period, in general, refer collectively to the original 30-day public review period, as extended (i.e., August 23, 2021 to September 30, 2021 at 5:00 p.m.) and the second 30-day extension (i.e., October 19, 2021 to November 18, 2021 at 5:00 p.m.). Likewise, all references to the Notice of Intent, unless otherwise specified, refer collectively to the Notice of Intent, dated August 23, 2021, the Extension Notice, dated September 21, 2021, and the Supplemental Notice of Intent, dated October 19, 2021.

**2. RESPONSES TO COMMENTS ON THE DRAFT INITIAL
STUDY/MITIGATED NEGATIVE DECLARATION**

The original bracketed comment letters are provided following by numbered responses to each individual comment received.

AGENCIES

From: Josephine Fong <jfong@baaqmd.gov>

Sent: Thursday, September 30, 2021 1:11 PM

To: Facilities <facilities@ccsf.edu>

Cc: Wendy Goodfriend <wgoodfriend@baaqmd.gov>; Henry Hilken <HHilken@baaqmd.gov>

Subject: Comment Letter for CCSF Evans Center Renovation and Aircraft Maintenance Technology Program Relocation IS/MND

Hi Alberto,

Please find the Air District's comment letter for the CCSF Evans Center Renovation and Aircraft Maintenance Technology Program Relocation IS/MND attached to this email.

Thank you,
Josephine

Josephine Fong

[Bay Area Air Quality Management District](#)

375 Beale Street, Suite 600, San Francisco, CA 94105

(415) 749-8637 | jfong@baaqmd.gov



**BAY AREA
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DISTRICT**

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Katie Rice

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SAN FRANCISCO COUNTY

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Shamann Walton

SAN MATEO COUNTY

David J. Canepa
Carole Groom
Davina Hurt

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Rob Rennie

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Erin Hannigan
Lori Wilson

SONOMA COUNTY

Teresa Barrett
Lynda Hopkins

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



September 30, 2021

Alberto Vasquez
Interim Associate Vice Chancellor of Construction/Capital Planning
City College of San Francisco
50 Frida Kahlo Way
San Francisco, CA 94112

RE: City College of San Francisco Evans Center Renovation and Aircraft Maintenance Technology Program Relocation – Initial Study/Mitigated Negative Declaration

Dear Mr. Vasquez,

Bay Area Air Quality Management District (Air District) staff has reviewed the Initial Study/Mitigated Negative Declaration (IS/MND) for the City College of San Francisco (CCSF) Evans Center Renovation and Aircraft Maintenance Technology Program Relocation (Project). CCSF proposes to retrofit and renovate the existing building at CCSF Evans Center and relocate the Aircraft Maintenance Technology Program from the San Francisco International Airport to Evans Center.

Compliance with Air District Permitting Requirements

The Air District is responsible for the issuance of air quality permits for stationary equipment in the Bay Area and the management of the resulting air emissions. Please note that certain equipment and operations (e.g., aircraft engines at the Project) will require CCSF to apply for an Air District Authority to Construct/Permit to Operate. If you have any questions regarding the Air District's permits, please contact Barry Young, Senior Advanced Projects Advisor, at byoung@baaqmd.gov or (415) 940-9641 to discuss permit requirements.

Air District staff is available to assist CCSF in addressing these comments. If you have any questions or would like to discuss Air District recommendations further, please contact Josephine Fong, Environmental Planner, at (415) 749-8637 or jfong@baaqmd.gov.

Sincerely,

Greg Nudd
Deputy Air Pollution Control Officer

Cc: BAAQMD Director Tyrone Jue
BAAQMD Director Myrna Melgar
BAAQMD Director Shamann Walton

Responses to Letter A-BAAQMD: Bay Area Air Quality Management District

Response A-BAAQMD-1

Comment noted. The College will apply for and comply with conditions of an Air District Authority to Construct/Permit to Operate, including but not limited to the operation of aircraft engines.

ORGANIZATIONS

From: Bradley Angel <bradley@greenaction.org>

Sent: Wednesday, September 15, 2021 5:17 PM

To: Facilities <facilities@ccsf.edu>; Shanell Williams <swilliams@ccsf.edu>; Tom Temprano <ttemprano@ccsf.edu>; Aliya Chisti <achisti@ccsf.edu>; Brigitte Davila <bdavila@ccsf.edu>; John Rizzo <jrizzo@ccsf.edu>; Thea Selby <tselby@ccsf.edu>; Alan Wong <alanwong@ccsf.edu>; studenttrustee@mail.ccsf.edu <studenttrustee@mail.ccsf.edu>

Cc: Arieann Harrison <a.harrison@tuchs.org>; CCLP Bay Area <cclpba@gmail.com>; Evan Ling <evdling@ucsc.edu>; Madeline Dawson <madeline.dawson@berkeley.edu>; Neha Jain Patkar <nehajp@stanford.edu>; Renay Jenkins <renaydjenkins@gmail.com>; SF Bay View <editor@sfbayview.com>; Tiffany Williams <Tiffany@greenaction.org>; Jean Barish <jeanbbarish@hotmail.com>; Chalam Tubati <vchalam.tubati@gmail.com>; SF Bay View <editor@sfbayview.com>; Laura Waxmann <LWaxmann@bizjournals.com>; Jessica Wolfrom <jwolfrom@sfmediaco.com>; Dizikes, Cynthia <CDizikes@sfchronicle.com>; Ida Mojada <imojedad@sfmediaco.com>; Zsea Bowmani <zsea@nlgsf.org>; Lucas Williams <luwilliams@ggu.edu>; sammy988@aol.com <sammy988@aol.com>; Lonnie Mason <First.Generation@greenmail.net>; Ahimsa Porter Sumchai MD <ahimsaportersumchaimd@comcast.net>; Aude Bouagnon <audetojoy@gmail.com>; Dr. Raymond Tompkins <rtomp@sbcglobal.net>

Subject: Request for extension of public comment period for: Proposed CCSF Aircraft Maintenance Technology Program - 1400 Evans Ave.

On behalf of our members, constituents and staff members who live in Bayview Hunters Point, Greenaction for Health and Environmental Justice requests a 30 day extension of the public comment period on the proposed CCSF Aircraft Maintenance Technology Program at 1400 Evans Avenue.

Many residents and community groups are totally unaware of this proposed project potentially moving into their community that already suffers from unacceptable levels of pollution and health disparities.

We encourage you to (1) extend the public comment period on the Initial Study/Proposed Mitigated Negative Declaration; (2) provide real and meaningful notice to the community; (3) provide notice and executive summaries of all relevant documents in languages spoken in the community, not just English (Spanish and Chinese especially); and (4) make sure that all documents are easily accessible to residents, not just online.

In addition, the link provided does not work so we cannot access the documents to be able to provide comments (see below),

As a public institution located in Bayview Hunters Point, we would hope CCSF will agree to this request, comply with public notice and language access requirements, and work with the community to reduce, not increase, pollution burdens.

Please let us know your response to this urgent request.

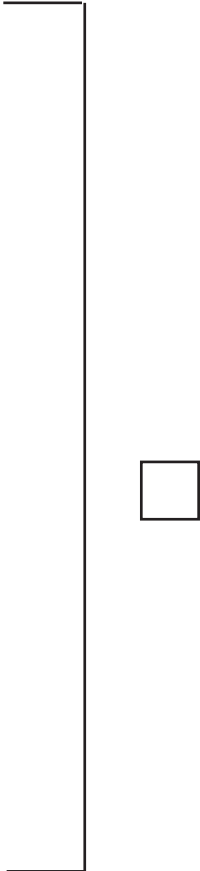
Thank you,

Bradley Angel, Executive Director, Greenaction for Health and Environmental Justice

Public and Agency Review

This Initial Study/Proposed Mitigated Negative Declaration will be circulated for public and agency review from August 23, 2021, to September 22, 2021. Copies of this document are available for review at the District's website at <https://www.ccsf.edu/about-ccsf/administration/finance-and-administration/officefacilities-and-capital-planning>. Comments on this Initial Study / Proposed Mitigated Negative Declaration must be received no later than 5:00 PM on September 22, 2021, and can be mailed or emailed to:

Alberto Vasquez
Interim Associate Vice Chancellor of Construction/Capital Planning
Facilities@ccsf.edu
(415) 239-3055



Responses Letter O-1-Greenaction: Greenaction for Health and Environmental Justice

Response O-1-Greenaction-1

On September 21, 2021, the College, in response to public requests, issued a public notice extending the end date of the 30-day Public Review Period, which commenced August 23, 2021, from September 22, 2021, to September 30, 2021 at 5:00 p.m. Subsequently, on October 19, 2021, the College issued a Supplemental Notice of Intent and extended the public review period for a second time, providing the public an additional 30-day period (commencing October 19, 2021 and ending on November 18, 2021 at 5:00 p.m.) to review and comment on the draft IS/MND. Therefore, the Public Review Period totaled 68 days and exceeded the requirement that when an MND is submitted to the State Clearinghouse, the review period shall last no less than 30 days, unless a shorter period is approved (14 CCR § 15105). The twice-extended Public Review Period provided ample opportunity for informed public participation in the CEQA process. Additionally, a public meeting, notice of which was included in the Notice of Intent, was also held on September 1, 2021 to receive oral comments concerning the draft IS/MND. Further, the extensions were determined in compliance with the mandate to carry out the [CEQA] process in the most efficient and expeditious manner possible. (Pub. Resources Code, § 21003, subd. (f).)

In efforts to facilitate informed decision making and informed public participation in the CEQA process, and in accordance with Executive Order N-54-20, the District pursued additional methods of public notice and outreach beyond what was required under the then-applicable Executive Order, and CEQA and the CEQA Guidelines. The original Notice of Intent (NOI) was posted with the San Francisco County Clerk and distributed to interested agencies, organizations, and individuals on August 23, 2021. The District engaged in outreach to known interested parties, and circulated the draft IS/MND primarily using electronic mail to approximately 40 stakeholders and community-based organizations, agencies, and individuals. Additionally, the College posted the Draft IS/MND on its Office of Facilities and Capital Planning website (www.ccsf.edu/facilities), as well as on its Evans Center Community Forums website (www.ccsf.edu/evans-center-community-forums).

The Extension Notice issued on September 21, 2021, mirrored the above posting and distribution methods. Finally, the Supplemental Notice of Intent issued on October 19, 2021, complied with both the requirements that were applicable after September 30, 2021, as well as the requirements that were in place prior to September 30, 2021, under Executive Orders Nos. N-54-20 and N-80-20 when the District issued the Notice of Intent and the Extension Notice. Specifically, the Supplemental Notice of Intent for the second extended review period was posted with the San

Francisco County Clerk, the Governor's Office of Planning and Research (via the State Clearinghouse CEQAnet web portal), and on the College's Office of Facilities and Capital Planning website and Evans Center Community Forums website (see web addresses above) on Tuesday, October 19, 2021. Again, the District engaged in outreach to known interested parties, and sent the Supplemental Notice of Intent to commenting and requesting parties. The Supplemental Notice of Intent also was distributed to all 40 stakeholders that were notified during the first circulation of the document, as well as to 64 representatives of organizations, public agencies, and individuals who expressed interest during the first review period. Additionally, the Supplemental Notice of Intent was provided to schools within a quarter-of-a-mile of the proposed Project, as well as to California Native American tribes traditionally and culturally affiliated with the geographic area of the proposed Project.

The District continued to make the draft IS/MND available to the public for review on the District's public-facing website (including, the District's Facilities and Capital Planning webpage and the Evans Center Community Forums webpage), as well as, subject to COVID-19 precautions and restrictions, in person by appointment at the District's Office of Facilities and Capital Planning (50 Frida Kahlo Way, Bungalow 606, San Francisco, CA 94112) for the duration of the second extension of the public comment period. Likewise, the draft IS/MND was distributed to the State Clearinghouse for a thirty (30) day state agency review and comment period on October 19, 2021, ending on November 18, 2021.

As publicly noticed in the Supplemental Notice of Intent, please be advised that the District's Board of Trustees will consider adoption of the IS/MND and, if adopted, will consider approval of the proposed Project, at its regularly scheduled public Board Meeting on December 9, 2021, at 3:00 p.m., or as soon thereafter as the matter may be heard. In addition to the notice of this meeting provided in the Supplemental Notice of Intent, this meeting will also be publicly noticed pursuant to the Ralph M. Brown Act. The Board Agenda for the December 9, 2021, Board Meeting will be posted on the Board of Trustees website on December 3, 2021.

The District fully complied with the public notice requirements under CEQA and provided sufficient opportunity for informed public participation in the CEQA process.

The District was made aware that the hyperlink to the IS/MND imbedded on page 5 of the IS/MND itself, when copied and pasted into other documents or applications, did not copy correctly, and led the user to a nonexistent page. However, the District has reviewed all web addresses set forth in the Notice of Intent, as well as the subsequent Extension Notice and Supplemental Notice of Intent, and verified that the web addresses set forth therein are correct and provide electronic

access to the draft IS/MND and related documents. Information about the proposed Project, including a copy of the IS/MND, has been electronically available on both the College's Office of Facilities and Capital Planning website (<https://www.ccsf.edu/about-ccsf/administration/finance-and-administration/office-facilities-and-capital-planning>) and Evans Center Community Forums website (<https://www.ccsf.edu/evans-center-community-forums>) since at least August 23, 2021.

Neither CEQA nor any other applicable statutory or regulatory mandate requires that environmental documents be published in any language other than English, inherently recognizing that the CEQA process is already a very lengthy and expensive one. CEQA does not require translation of CEQA documents into additional languages as requested by commenters or is it the policy of CCSF to prepare environmental documents in additional languages, and CCSF adheres to the spirit and the letter of the law. While CEQA is to be broadly construed to afford the fullest possible protection to the environment, this must be done within the reasonable scope of the statutory language. (*Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247, 259-262.) Public Resources Code section 21083.1 states that CEQA and the *CEQA Guidelines* shall not be interpreted in a manner which imposes procedural or substantive requirements beyond those explicit stated. Further, Public Resource Code section 21003 declares that "[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." (Pub. Resources Code, §21003, subd. (f).) CEQA's emphasis on environmental protection cannot be a basis for ignoring specific statutory language emphasizing the need to consider economic costs of CEQA compliance, and procedural or substantive requirements not "explicitly stated" either in CEQA or the *CEQA Guidelines* should not be imposed.

Furthermore, no published federal or state court decision has ruled that to comply with CEQA, a public agency must, as a matter of law, translate environmental documents, agency proceedings, or public notices into a language other than English. More generally, courts have consistently concluded that, absent express Constitutional or statutory authority, public agencies need not provide non-English speakers with translation services. (See *Ramirez v. Plough* (1993) 6 Cal.4th 539, 550-552; *Guerrero v. Carleson* (1973) 9 Cal.3d 808, 837-839.) While California legislation requiring the translation of CEQA documents was introduced in 2014 (AB 543), it was vetoed by the Governor of California on September 25, 2014. Therefore, the draft IS/MND complies with the requirements of CEQA, and a translation into languages other than English is not required.

In response to COVID-19, the Governor issued Executive Order N-54-20 (please refer to footnote 1, above). Use of hard-copy documents in publicly accessible locations would have been counter to the Public Health priorities of this Executive Order. However, as the Order was set to expire on September 30, 2021 and respecting the intent of this request in compliance with all contemporary Public Health Mandates and Guidelines, on September 21, 2021 CCSF Office of Facilities and Capital Planning provided the following access as a courtesy: "Subject to COVID-19 precautions and restrictions, interested persons may also schedule an appointment at CCSF's Office of Facilities and Capital Planning (50 Frida Kahlo Way, Bungalow 606, San Francisco, CA 94112). Please call (415) 239-3055 to review the materials." CCSF did not receive any requests to schedule an appointment to review the draft IS/MND in person during the first or second extended Public Review Period.

From: Bradley Angel <bradley@greenaction.org>

Sent: Thursday, September 30, 2021 4:04 PM

To: Facilities <facilities@ccsf.edu>

Cc: Shanell Williams <swilliams@ccsf.edu>; Tom Temprano <ttemprano@ccsf.edu>; Aliya Chisti <achisti@ccsf.edu>; Brigitte Davila <bdavila@ccsf.edu>; Thea Selby <tselby@ccsf.edu>; Alan Wong <alanwong@ccsf.edu>; studenttrustee@mail.ccsf.edu <studenttrustee@mail.ccsf.edu>; Arieann Harrison <a.harrison@tuchs.org>; CCLP Bay Area <cclpba@gmail.com>; Evan Ling <evdling@ucsc.edu>; Madeline Dawson <madeline.dawson@berkeley.edu>; Neha Jain Patkar <nehajp@stanford.edu>; Renay Jenkins <renayjenkins@gmail.com>; SF Bay View <editor@sfbayview.com>; Tiffany Williams <Tiffany@greenaction.org>; Jean Barish <jeanbbarish@hotmail.com>; Chalam Tubati <vchalam.tubati@gmail.com>; Laura Waxmann <LWaxmann@bizjournals.com>; Jessica Wolfrom <jwolfrom@sfmediaco.com>; Dizikes, Cynthia <CDizikes@sfchronicle.com>; Ida Mojada <imojada@sfmediaco.com>; Zsea Bowmani <zsea@nlgsf.org>; Lucas Williams <luwilliams@ggu.edu>; sammy988@aol.com <sammy988@aol.com>; Aude Bouagnon <audetojoy@gmail.com>; Dr. Raymond Tompkins <rtomp@sbcglobal.net>; John Al-Amin <jalamin@ccsf.edu>; John Rizzo <jrizzo@ccsf.edu>; KPFA News Department <news@kpfa.org>; Bay City News Datebook <bcndatebook@pacbell.net>; assignmentdesk@kqed.org <assignmentdesk@kqed.org>; Tom Molanphy <tmolanphy@hotmail.com>; LonnieM@firstgenerationehed.org <LonnieM@firstgenerationehed.org>; Margaret Gordon (margaret.woiep@gmail.com) <margaret.woiep@gmail.com>; Tyler Earl <tyler@cbeal.org>; julia@greenaction.org <julia@greenaction.org>; bvhp.ej@gmail.com <bvhp.ej@gmail.com>; Mrs. Nikcole Cunningham <mrs.nikcolecunningham@gmail.com>

Subject: Re: Comments from Greenaction, Bayview Hunters Pt. Mothers & Fathers Committee, and Marie Harrison Community Foundation regarding Proposed CCSF Aircraft Maintenance Technology Program - 1400 Evans Ave.

Please find attached comments from the Bayview Hunters Point Mothers and Fathers Committee, Marie Harrison Community Foundation, and Greenaction for Health and Environmental Justice regarding the CCSF Aircraft Maintenance Technology Program proposed for a new location at 1400 Evans.

We object to the project being moved to the heart of Bayview Hunters Point, and object to the total lack of proper public notice and opportunities for meaningful public participation.

***Greenaction for Health and Environmental Justice
Bayview Hunters Point Mothers and Fathers Committee
Marie Harrison Community Foundation***

September 30, 2021

Comments in Opposition to Proposed Relocation of Aircraft Maintenance Technology Program to CCSF Campus in Bayview Hunters Point, and Demand for Proper Notice and Comprehensive Public and Environmental Review

1. Summary of Comments:

The Bayview Hunters Point Mothers and Fathers Committee, Marie Harrison Community Foundation, and Greenaction for Health and Environmental Justice, submit these comments in opposition to the proposed relocation of the Aircraft Maintenance Technology Program to the CCSF Campus in Bayview Hunters Point. We submit these comments on behalf of our members and constituents who reside in Bayview Hunters Point.

Bayview Hunters Point is acknowledged by local, regional and state government agencies to be highly vulnerable and at risk from pollution. CCSF's proposed project would add more pollution to this overburdened and heavily impacted neighborhood, is irresponsible and an act of environmental racism and injustice. We urge CCSF to find a more appropriate location for this program.

1

2. CCSF has failed to provide proper notice or opportunities for public comment and has violated Language Access and Civil Rights laws and policies:

The CCSF website states the following:

Public and Agency Review

This Initial Study/Proposed Mitigated Negative Declaration will be circulated for public and agency review from August 23, 2021, to September 22, 2021.

However, the proposed project remains unknown to the vast majority of Bayview Hunters Point residents. Meaningful notice was not provided to the community to inform them of the proposed project or of opportunities for public comment.

2

If anyone was lucky enough to see the Notice, if that person did not read English they would be unable to know what the Notice said and certainly unable to read the "Initial Study/Proposed Mitigated Negative Declaration."

CCSF has improperly failed to provide even summaries of the "Initial Study/Proposed Mitigated Negative Declaration" and associated documents in the main languages (other than English) spoken in Bayview Hunters Point – especially Spanish and Chinese.

The failure to provide translation of the Notice and Executive Summaries of the key environmental review documents results in the total exclusion of many Bayview Hunters Point residents from the process. This is a violation of language access and of state and federal civil rights laws.

2

3. CCSF failed to respond to our requests for an extension of the “public comment period.”

On September 15, 2021, Greenaction’s Executive Director emailed the CCSF contact email for this project as well as the CCSF Board of Trustees, but we never got the courtesy of a reply to our important requests – except from Trustee John Rizzo who provided an accurate link to access the CEQA document. CCSF’s failure – or refusal – to respond to legitimate requests and concerns is improper and resulted in the continued exclusion of many members of the public from the CEQA review process.

The following is the text of that email to CCSF:

On behalf of our members, constituents and staff members who live in Bayview Hunters Point, Greenaction for Health and Environmental Justice requests a 30-day extension of the public comment period on the proposed CCSF Aircraft Maintenance Technology Program at 1400 Evans Avenue.

Many residents and community groups are totally unaware of this proposed project potentially moving into their community that already suffers from unacceptable levels of pollution and health disparities.

We encourage you to (1) extend the public comment period on the Initial Study/Proposed Mitigated Negative Declaration; (2) provide real and meaningful notice to the community; (3) provide notice and executive summaries of all relevant documents in languages spoken in the community, not just English (Spanish and Chinese especially); and (4) make sure that all documents are easily accessible to residents, not just online.

3

In addition, the link provided does not work so we cannot access the documents to be able to provide comments (see below),

As a public institution located in Bayview Hunters Point, we would hope CCSF will agree to this request, comply with public notice and language access requirements, and work with the community to reduce, not increase, pollution burdens.

Please let us know your response to this urgent request.

Thank you,

Bradley Angel, Executive Director, Greenaction for Health and Environmental Justice

On September 29th, Greenaction again attempted to get a response from CCSF to our requests, and sent the following email which has not been responded to:

Hello CCSF,

On behalf of our members who reside in Bayview Hunters Point, we again request an extension of the public comment period. We heard through the grapevine that there was an extension to the

30th, but we were never notified despite submitting several written requests and concerns about the notice, comment period, and proposed project.
We will challenge any process that fails to provide real, meaningful public notice and opportunities for public comment.
We expect CCSF to do the right thing.

3

Bradley Angel, Greenaction for Health and Environmental Justice

4. CCSF Claims About Non-Sensitive Environment, No Cumulative Impact, and No Significant Environmental Effects is Without Basis in Fact or Reality:

Page 13 of the “Initial Study” document states in relevant part:

Background. On January 23, 2020, the CCSF District’s Board of Trustees approved a CEQA determination as a categorical Exemption for the Evans Center Renovation and Temporary Campus Project. In its determination the District concluded that the renovation and temporary campus project is not barred by any exceptions contained in CEQA Guidelines section 15300.2. The District found that the project 1) is not located in a sensitive environment, 2) has no cumulative impact, 3) will not have significant effect on the environment due to unusual circumstances, 4) will not result in damage to scenic resources, 5) is not located on a hazardous waste site, and 6) will not cause a substantial adverse change in the significance of a historical resource. Based on these findings, CCSF filed a Notice of Exemption for this renovation and temporary campus project.

The claim that the project would not be located in a sensitive environment and would have “no cumulative impact” is factually and boldly false. CCSF should know better.

4

As an academic institution, CCSF should know that a few minutes of research would reveal that government agencies agree that Bayview Hunters Point itself is in a sensitive environment and cumulatively impacted by multiple stationary and mobile pollution sources.

The CCSF facility is not in a bubble. It is not enclosed. There will be emissions.

Adding pollution sources to the CCSF campus will clearly have some negative impact directly and cumulatively on the environment of Bayview Hunters Point – posing an additional and new environmental health threat to a neighborhood that already suffers profound environmental and health disparities.

Adding more pollution in the heart of an already at risk community is reckless and unacceptable, especially as there are alternative location more distant from residential areas than the proposed site.

5. Bay Area Air Quality Management District Designates Bayview Hunters Point/Southeast San Francisco as a “CARE Community” Vulnerable to Cumulative Impacts from Air Pollution:

Bayview Hunters Point (BVHP) is a diverse, low-income community of color in Southeast San Francisco that suffers from the disproportionate burden of pollution and is at risk from climate change due to its location on the San Francisco Bay. Bayview Hunters Point is a majority-minority community; One-third of residents are African American, 30% Asian/Pacific Islander, and almost 25%

5

Hispanic/Latino. Residents suffer high rates of infant mortality, asthma, cardiovascular diseases, and cancer.

The Bay Area Air Quality Management District (BAAQMD) identifies BVHP as a "CARE" community area vulnerable to "Cumulative Impacts from Air Pollution" including 24-hour PM 2.5 exceedances.

5

6. The State of California’s CalEnviroScreen Ranks Bayview Hunters Point as one of the Communities in the State Most Vulnerable to Pollution:

CalEPA’s CalEnviroScreen evaluates and ranks communities statewide based on environmental, health and socio-economic characteristic and disparities to determine vulnerability.

According to CalEnviroScreen 4.0, Bayview Hunters Point ranks in the 90th percentile in terms of pollution. This means that Bayview Hunters Point has a higher pollution burden than 90% of California. For diesel particulate matter, Bayview Hunters Point falls in the 99th percentile and the 97th percentile for groundwater threats. Additionally, most of Bayview Hunters Point in within the 80th-96th percentile for hazardous waste facilities in the area, according to the CalEnviroScreen 3.0 Hazardous Waste Map. The effects of this pollution are reflected in the health of the community. Bayview Hunters Point lies in the 97th percentile for low birth weight and the 96th percentile for asthma.

6

7. Initial Study’s Claim of No Air Quality Impact is Incorrect:

Page 24 of the Initial Study contains a check list: “ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.”

The checklist indicates that there would be no potentially significant impact on air quality. We disagree strongly with that assertion.

On page 32 it states there would be “Less than significant impact” on air quality. We disagree that the impact would be “less than significant.”

7

Page 57 of the Initial Study states: “However, **the proposed project will include stationary sources of TAC emissions from the operation of jet engines on the project site.** The main pollutant of concern is lead compounds from the jet engines fueled by aviation gas (AVGAS)” (bold emphasis added)

It is thus clear that the project would add both criteria and Toxic Air Contaminants into the environment of the community. Adding any additional pollution – especially toxics - into a neighborhood clearly overburdened and impacted by current and historic pollution is significant.

8. Conclusion:

CCSF needs to be respectful of the community and its students, faculty and workers, and reject this proposed project.

8

If CCSF wants to continue studying the potential impacts of the project, do it correctly in compliance with all legal requirements – including proper notice, language access, proper public comment periods, and comprehensive public and environmental review including public hearings.

The best path forward would be for CCSF to work with the community to find a more appropriate location for this program.

Lastly, please acknowledge receipt of these comments and provide a response to comments.

Thank you,

Bradley Angel, Executive Director, Greenaction for Health and Environmental Justice
bradley@greenaction.org

Leaotis Martin and Renay Jenkins, Co-Coordiators, Bayview Hunters Point Mothers and Fathers Committee
renay_jenkins@yahoo.com

Arieann Harrison, Director, Marie Harrison Community Foundation a.harrison@tuchs.org

Response to Letter O-2-Greenaction: Greenaction for Health and Environmental Justice

Response O-2-Greenaction-1

The air quality analysis takes into consideration the air quality conditions in the project area in analyzing the air emissions associated with the proposed project are in Section III.3, Air Quality, page 32 of the draft IS/MND. Air quality impacts were evaluated in accordance with the methodologies recommended by CARB and the BAAQMD. Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model version 2016.3.2 (CalEEMod). CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Pollutant concentrations from the jet engines were estimated using the U.S. EPA AERMOD dispersion model and human health risks were estimated using the Hotspots Analysis and Reporting Program (HARP2) Risk Assessment Standalone Tool (RAST). As documented in the draft IS/MND, based on the air quality analysis prepared in compliance with applicable guidelines, air emissions associated with the proposed project would be below the thresholds and less than significant.

It also should be noted that air emissions from construction and operation of the proposed project will be regulated by Bay Area Air Quality Management District (Air District). More specifically for this proposed project, the Air District is responsible for the issuance of air quality permits for stationary equipment in the Bay Area and the management of the resulting air emissions. Please note that certain equipment and operations (e.g., aircraft engines at the project engines) will require CCSF to apply for an Air District Authority to Construct/Permit to Operate (See **Response A-BAAQMD-1**).

With regard to cumulative impacts (e.g., pollution exposure to highly vulnerable populations), all items on the Initial Study Checklist that have been checked “Less Than Significant Impact,” or “No Impact” indicate that, based on the analysis documented in the Initial Study, the proposed project would not have a significant adverse environmental effect relating to that issue. For items that have been checked “Less than Significant with Mitigation Incorporated,” based on the Initial-Study analysis, the proposed project would not have a significant adverse environmental effect with implementation of mitigation measures identified for this issue in this document. A discussion is included for most issues checked “Less than Significant with Mitigation Incorporated,” “Less than Significant Impact,” or “No Impact.” For each checklist item, the evaluation has considered the impacts of the project both individually and cumulatively.

The rest of the comment concerns political, social, or economic issues that are unrelated to the draft IS/MND's analysis. A decision on the proposed Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve and carry out the proposed Project, and how to do so. No further response is required because the comment does not address significant environmental issues related to the draft IS/MND.

Response O-2-Greenaction-2

With respect to the public notice provided informing the public about the proposed Project and the opportunities for public review and comment on the IS/MND, see **Response O-1-Greenaction-1**.

Neither CEQA nor any other applicable statutory or regulatory mandate requires that environmental documents be published in any language other than English, inherently recognizing that the CEQA process is already a very lengthy and expensive one. Nor is it the policy of CCSF to prepare environmental documents in additional languages, and CCSF adheres to the spirit and the letter of the law. While CEQA is to be broadly construed to afford the fullest possible protection to the environment, this must be done within the reasonable scope of the statutory language. (*Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247, 259-262.) Public Resources Code section 21083.1 states that CEQA and the *CEQA Guidelines* shall not be interpreted in a manner which imposes procedural or substantive requirements beyond those explicit stated. Further, Public Resource Code section 21003 declares that "[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." (Pub. Resources Code, §21003, subd. (f).) CEQA's emphasis on environmental protection cannot be a basis for ignoring specific statutory language emphasizing the need to consider economic costs of CEQA compliance, and procedural or substantive requirements not "explicitly stated" either in CEQA or the *CEQA Guidelines* should not be imposed.

Furthermore, no published federal or state court decision has ruled that to comply with CEQA, a public agency must, as a matter of law, translate environmental documents, agency proceedings, or public notices into a language other than English. More generally, courts have consistently concluded that, absent express Constitutional or statutory authority, public agencies need not provide non-English speakers with translation services. (See *Ramirez v. Plough* (1993) 6 Cal.4th 539,

550-552; *Guerrero v. Carleson* (1973) 9 Cal.3d 808, 837-839.) While California legislation requiring the translation of CEQA documents was introduced in 2014 (AB 543), it was vetoed by the Governor of California on September 25, 2014. Therefore, the draft IS/MND complies with the requirements of CEQA, and a translation into languages other than English is not required.

Response O-2-Greenaction-3

The comment states the commentor did not receive a reply from the District's contact email (**Facilities@ccsf.edu**) for the Project in response to the commentor's September 15, 2021, public comment email. For the commentor's convenience, a copy of the reply provided by the District's Office of Facilities and Capital Planning on September 22, 2021, is pasted below.

Evans Center- Initial Study / Mitigated Negative Declaration- Public Comment Period Extended

Facilities <facilities@ccsf.edu>

Wed 9/22/2021 9:51 AM

To: Bradley Angel <bradley@greenaction.org>

Bradley,

Facilities department received an email regarding the Evans Center- Initial Study/ Mitigated Negative Declaration. Below is the email that was sent out regarding public comment extension.

Dear Community,

Members of our community have raised concerns regarding a hyperlink reference provided in the Initial Study / Mitigated Negative Declaration for the City College of San Francisco Evans Center Retrofitting and Modernization and Aircraft Maintenance Technology Program Relocation, which was published for notice on August 22, 2021. On page 5 of that document, in the Public and Agency Review section, the hyperlink listed, when copied and pasted into other documents or applications, does not copy correctly, and leads the user to a nonexistent page.

The hyperlink in the document would direct individuals to our City College of San Francisco, Office of Facilities and Capital Planning website, which has the Initial Study / Mitigated Negative Declaration documents posted for review.

While there was no error on the part of the City College of San Francisco in posting and making this notice accessible, **PLEASE BE ADVISED** that the 30-day public comment period for the Draft IS/MND, commencing August 23, 2021 to September 22, 2021, **has been extended an additional week until September 30, 2021**. The IS/MND is available for review through the College's website "Office of Facilities and Capital Planning," and the link where the document is posted [can be accessed here](#).

Subject to COVID-19 precautions and restrictions, interested persons may also schedule an appointment at CCSF's Office of Facilities and Capital Planning (50 Frida Kahlo Way, Bungalow 606, San Francisco, CA 94112). Please call (415) 239-3055 to review the materials.

Written comments will continue to be accepted until **5:00 PM on September 30, 2021**, and should be sent to:

Facilities Construction and Planning
City College of San Francisco
Attn: Alberto Vasquez
50 Frida Kahlo Way, Bungalow 606
San Francisco, CA 94112
or via email to: Facilities@ccsf.edu

Subsequently, on September 30, 2021, Dianna R. Gonzales, J.D., CCSF's Interim Chancellor, responded to Mr. Angel's email acknowledging receipt of the public comment letter:

"Thank you for your email, Mr. Angel. I've included our Vice Chancellor of Finance and Administration (which includes Facilities), Dr. John al-Amin." On September 30, 2021, Mr. Angel replied: "Thank you Chancellor Gonzales for your email acknowledgment. Please take these comments seriously. We would like to partner with CCSF, not be in conflict. Together we can further the goals of CCSF while protecting public health of this highly at risk community."

On October 6, 2021, Chancellor Gonzales and John al-Amin, Ph.D., CCSF's Vice Chancellor, Finance and Administration, both replied to Mr. Angel by email to let him know CCSF was in the process of reviewing public comments received, and although responses to public comments on a MND are not required under CEQA, CCSF was in the process of preparing responses. Specifically, Chancellor Gonzales replied:

"Mr. Angel, My apologies for the late response. I know Vice Chancellor al-Amin and his staff are carefully reviewing all the comments received. And thank you for your offer to partner with CCSF, rather than work through this in conflict. I hope we can find common ground, for the benefit of our students and the community." Likewise, Vice Chancellor al-Amin replied: "Good evening! We are in the process of reviewing all comments received in order to take the action(s) necessary to respond to the comments and address concerns, if needed. We will provide notification of our response when complete."

See also **Response O-1-Greenaction-1**.

Response O-2-Greenaction-4

As noted on page 13 of the IS/MND, on January 23, 2020, the CCSF District's Board of Trustees approved a CEQA determination as a categorical Exemption for the Evans Center Renovation and Temporary Campus Project. Based on the CEQA determination, the District installed the temporary sprung and modular structures in the parking lot to temporary house the administration offices and to provide classrooms for the programs offered at Evans Center. Current construction is associated with the installation of lavatories and other accessories for the temporary sprung and modular structures.

The responses provided herein address comments on the draft IS/MND and do not apply to previous Notices of Exemption or other projects.

Please also see **Response O-2-Greenaction-7**.

The rest of the comment concerns political, social, or economic issues that are unrelated to the IS/MND's analysis. A decision on the proposed Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve

and carry out the proposed Project, and how to do so. No further response is required because the comment does not address significant environmental issues related to the draft IS/MND.

Response O-2-Greenaction-5

In compliance with BAAQMD requirements, the air quality analysis, presented in Section III.3, on page 32 of the IS/MND, addresses with individual and cumulative air quality impacts associated with the proposed project. As such, the analysis found that the localized emissions from operation of the proposed project would be less than significant. The College will work with the BAAQMD to secure any permits for sources that are regulated by stationary source or area source regulations. Please see **Response A-BAAQMD-1** and **Response O-2-Greenaction-7**.

Response O-2-Greenaction-6

See **Response O-2-Greenaction-5** and **Response O-2-Greenaction-7**.

Response O-2-Greenaction-7

Air emissions associated with the operation of the jet engines as part of the AMT Program are analyzed in Section III.3, Air Quality of the draft IS/MND. Air emissions associated with lead compounds from the jet engines are analyzed on page 57 to Page 66 of the draft IS/MND. The analysis includes a health risk assessment that evaluates the risk posed by lead emissions. The health risk analysis was conducted following methods in the Office of Environmental Health Hazard Assessment's (OEHHA) Guidance Manual for Preparation of Health Risk Assessments and BAAQMD's CEQA Guidance. In compliance with BAAQMD guidelines health risk to sensitive receptors within 1,000-foot radius of the project site analyzed cancer risk posed to nearby sensitive receptors, non-cancer health hazards, and PM_{2.5} emissions. As noted in the draft IS/MND, results of the health risk assessment indicate that cancer risk posed to the receptors over 9, 30, and 70 years of operational exposure from multiple exposure pathways (inhalation, soil, dermal, and breast milk) would each be less than 1 in one million and, therefore, would not exceed BAAQMD thresholds. The maximum concentration of lead averaged over a thirty-day period at a sensitive residential receptor near Evans Center was calculated to be 0.00017 µg/m³, which is significantly lower than CARB's identified approvable level of 0.30 µg/m³.³⁷ Therefore, the noncancer risk associated with the proposed project would not exceed applicable thresholds. The maximum concentration of PM_{2.5} at the residential receptor resulting from the jet engines exhaust associated with the proposed project was found to be 0.003 µg/m³, which is below the BAAQMD significance thresholds of 0.3 µg/m³.

Health risk analysis was also conducted for occupants of the project site and levels of cancer risk, non-cancer hazards, and PM 2.5 emissions were found to be well below the significance thresholds. In addition, air filters of existing building and sprung and modular structures would have Minimum Efficiency Report Value (MERV) 13 filters. MERV 13 filters remove between 80% to 89.9% of particulate matter between 1.0 and 3.0 µg/m³.

For concerns related to publication and circulation of the draft IS/MND, see **Response O-2-Greenaction-1**.

Response O-2-Greenaction-8

CCSF has complied with all substantive and procedural requirements under CEQA for the draft IS/MND. Please refer to **Response O-1-Greenaction-1**, **Response O-2-Greenaction-2** and **Response O-2-Greenaction-3**, above. In addition to the requirements under CEQA, CCSF has actively engaged the community and kept them informed with respect to the possible relocation of the AMT program and proposed renovations at the Evans campus through regular Community Forums dating back to November 2020, answers to frequently asked questions, and other relevant information publicly available on CCSF's Evans Center Community Forums webpage (<https://www.ccsf.edu/evans-center-community-forums>).

A decision on the proposed Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve and carry out the proposed Project, and how to do so. No further response is required because the comment does not address significant environmental issues related to the draft IS/MND.

From: Jean Barish <jeanbbarish@hotmail.com>

Sent: Sunday, September 19, 2021 9:54 AM

To: Chancellor <chancellor@ccsf.edu>; John Al-Amin <jalamin@ccsf.edu>; Facilities <facilities@ccsf.edu>; Thomas Boegel <tboegel@ccsf.edu>

Cc: Shanell Williams <williams.shanell@gmail.com>; Tom Temprano <ttemprano@ccsf.edu>; Brigitte Davila <bdavila@ccsf.edu>; Aliya Chisti <achisti@ccsf.edu>; Brigitte Davila <bdavila@ccsf.edu>; John Rizzo <jrizzo@sprintmail.com>; Thea Selby <tselby@ccsf.edu>; Alan Wong <alanwong@ccsf.edu>; studenttrustee@mail.ccsf.edu <studenttrustee@mail.ccsf.edu>; Shamann.Walton@sfgov.org <Shamann.Walton@sfgov.org>

Subject: Initial Study - AMT Relocation: Request for Extension of Time

I am writing on behalf of Higher Education Action Team (“HEAT”), an organization of concerned CCSF faculty, students, staff and community members who support accessible, free and safe public higher education.

HEAT has recently learned that an Initial Study/Mitigated Negative Declaration of the environmental impacts of the relocation of CCSF’s Aircraft Maintenance Technology Program to 1400 Evans Ave. was released at the end of August, 2021. This study concludes that a relocation will not cause any significant environmental impacts that cannot be mitigated, and recommends the issuance of a Mitigated Negative Declaration (“MND”). Public comments on this Study must be submitted by September 22, 2021.

The release of this Study was not widely publicized. Even the residents of Bayview/Hunters Point, the impacted neighborhood, were unaware of this Study until recently. Accordingly, HEAT requests a 30-day extension of the public comment period on this Study in order that it can be thoroughly reviewed.

Further, HEAT supports the request of Greenaction for Health and Environmental Justice for this extension of time. Greenaction represents the residents in Bayview/Hunters Point. Like HEAT, these stakeholders must also be given enough time to review this Study. These San Franciscans have suffered enough environmental injustice. They should not be subjected to a rush to judgment.

At several of the Evans Community Forums you organized to discuss the relocation of the AMT, participants expressed frustration at the lack of transparency by the administration regarding the potential environmental impacts on the historically African-American Bayview neighborhood. (http://theguardian.com/7_news_airport-evans-move_jones/) Extending the public comment period will help restore a more positive relationship with the Bayview/Hunters Point residents, and demonstrate a willingness to work cooperatively with these stakeholders.

Thank you for considering this request. Time is of the essence. The September 22 deadline is this Wednesday. We look forward to your favorable response as soon as possible.

Sincerely,

Jean B Barish

Member, Higher Education Action Team

Responses to Letter O-1-HEAT: Higher Education Action Team

Response O-1-HEAT-1

See **Response O-1-Greenaction-1 and O-2-Greenaction-8.**

From: SF City College HEAT <sfcitycollegeheat@gmail.com>

Sent: Thursday, October 28, 2021 11:05 PM

To: mayorlondonbreed@sfgov.org <mayorlondonbreed@sfgov.org>; board.of.supervisors@sfgov.org <board.of.supervisors@sfgov.org>; AirportCommissionSecretary@flysfo.com <AirportCommissionSecretary@flysfo.com>; Shanell Williams <swilliams@ccsf.edu>; Tom Temprano <ttemprano@ccsf.edu>; Aliya Chisti <achisti@ccsf.edu>; Brigitte Davila <bdavila@ccsf.edu>; John Rizzo <jrizzo@ccsf.edu>; Thea Selby <tselby@ccsf.edu>; Alfred Wong <awong@ccsf.edu>; Max Hirschfeld <studenttrustee@mail.ccsf.edu>; ddmartin@mpc.edu <ddmartin@mpc.edu>; Chancellor <chancellor@ccsf.edu>; John Al-Amin <jalamin@ccsf.edu>; Facilities <facilities@ccsf.edu>; Thomas Boegel <tboegel@ccsf.edu>; aft@aft2121.org <aft@aft2121.org>; mfinkels@aft2121.org <mfinkels@aft2121.org>; mbravewoman@aft2121.org <mbravewoman@aft2121.org>; afailes@aft2121.org <afailes@aft2121.org>

Cc: Assemblymember.ting@assembly.ca.gov <Assemblymember.ting@assembly.ca.gov>; sflc@sflaborcouncil.org <sflc@sflaborcouncil.org>; kim@sflaborcouncil.org <kim@sflaborcouncil.org>; Bradley Angel <bradley@greenaction.org>

Subject: HEAT Letter On the closing of the Aircraft Maintenance Technology (“AMT”) training program at San Francisco International Airport (“SFO”)

HEAT Letter On the closing of the Aircraft Maintenance Technology (“AMT”) training program at San Francisco International Airport (“SFO”)

City College of San Francisco’s Higher Education Action Team (“HEAT”), an organization of concerned CCSF faculty, students, staff and community members who support accessible, free and safe public higher education, submits this letter in opposition to the closing of the Aircraft Maintenance Technology (“AMT”) training program at San Francisco International Airport (“SFO”), and its relocation to City College’s Evans Center at 1400 Evans Avenue in the Bayview/Hunters Point neighborhood of San Francisco.

1

Due to the indifference and incompetence of the City College administration, a valuable FAA-certified training program for aircraft technicians was suspended in the Fall of 2020, and has not been reinstated. Instead, CCSF is planning to relocate this program to the Evans Center. There are numerous reasons why the AMT program should not be relocated to the Evans Center.

There Is Not Enough Classroom Space at 1400 Evans

2

The 1400 Evans Avenue building currently houses the Automotive, Motorcycle,

Construction, and Building Maintenance Departments, which includes automotive technology and motorcycle maintenance training programs. The classroom space allocated to the AMT program is too small to accommodate the needs of the program. If the AMT program is returned to the Evans Center, it would have significantly less usable space than it has at SFO. It is even possible that inadequate space could jeopardize the program's Federal Aviation Administration certification. There is also concern that the AMT program would reduce the available space for courses already taught there. The greatest reduction would be in the Motorcycle Maintenance program, which would have about two-thirds less space than it presently has. (Initial Study, pp. 10, 19) It is impractical and infeasible to attempt to shoehorn the AMT program into a building that is already being fully utilized by other programs.

2

Housing the AMT Program at 1400 Evans Poses Environmental Risks

There are significant concerns about the environmental impact of housing this program at 1400 Evans Avenue. This program was not designed to be located in a mixed-use residential/commercial neighborhood. SFO is the appropriate place for this program, not Bayview/Hunters Point. Large, noisy jet engines will be tested, using toxic jet fuel containing lead. These engines are deafening, as is frequent riveting. The impacts that must be considered include indoor and outdoor noise, air pollution, ground water pollution and greenhouse gas emissions. The Bayview/Hunters Point communities have suffered too much environmental injustice. The neighborhood has often been used as a dumping ground for San Francisco's most hazardous and toxic industries. In fact, it was recently announced that developers will pay over \$6 million in a settlement with homeowners facing impacts from a toxic cleanup scandal. ([Hunters Point Shipyard residents settle with developer after cleanup scandal - The San Francisco Examiner](#))

3

Public Review of the Environmental Initial Study Was Flawed

Despite these environmental concerns, on August 23, 2021, CCSF released an Initial Study (Attached) addressing environmental impacts of the proposed relocation. The Study concluded that a relocation of the program to 1400 Evans would not cause any significant environmental impacts that cannot be mitigated. The Study recommended that a full Environmental Impact Report would not be necessary. Public comments on this Study were to be submitted by September 22, 2021.

But the release of this Study was not widely publicized. Community organizations representing Bayview/Hunters Point, as well as residents of the impacted neighborhood, were unaware of this Study until several weeks after it was released, as the clock for public comments was ticking. And to add insult to injury, numerous requests to the CCSF Administration for a 30-day extension of time to respond to the Study were initially ignored.

4

On September 21 the Administration announced that due to a technical problem with the publication of the Study on the CCSF website they would grant an 8-day extension of time to respond until September 30. But when they granted this short extension of the comment period, the Administration did not even notify the community members who had alerted

CCSF to the technical problem in the first place. This blatant disregard for those most impacted by the proposed AMT relocation was an insult to the Bayview/Hunters Point Community, and is another example of the city government and the leadership at City College displaying a lack of concern for the environmental health of Bayview/Hunters Point and its unwillingness to cooperate with this community.

On October 19, CCSF unexpectedly announced that the public comment period for the Initial Study/Mitigated Negative Declaration had been extended to November 18, 2021. (Attached)

4

HEAT appreciates this extension of time. But it regrets that a reasonable request for an extension was not immediately granted. The programs at the Evans Center are a vital part of the Bayview/Hunters Point community, and it is imperative that the CCSF leadership collaborates with this community to meet its needs for education and training.

Students Have Been Unable to Complete the AMT Program

The suspension of the AMT program has left dozens of students in a state of limbo. At one time the CCSF Administration assured these students that they would help them find other programs in the Bay Area where they could complete their courses and get their FAA certification. But that assistance was never provided. Instead, the students were told they were on their own, and it was up to them to find other programs where they could complete their course work. This indifference to students who trusted CCSF and enrolled in a program they assumed they would be able to complete is unconscionable.

5

City College Failed to Adequately Lobby to Retain the AMT Program at SFO

One of the reasons that SFO officials gave for closing the AMT program at the airport was that a proposed airport expansion made it impossible to continue to rent that space to CCSF. But once COVID-19 decimated the air travel industry in early 2020, CCSF should have more aggressively pursued continuing to lease the space there. Their unwillingness to stand up for CCSF students, and instead passively comply with the wishes of SFO officials, demonstrates unacceptable indifference to the students they are supposed to serve.

Additionally, we understand that a for-profit AMT program may soon be opening at SFO. If this is true, it raises questions about the supposed lack of availability of space there, and suggests that the real reason the lease was not renewed was because it would be more profitable for the space to be privatized and leased to a profit-making enterprise. Again, if CCSF was complicit with this, they, along with SFO management and the Airport Commission, should be held accountable

6

Conclusion

There are many reasons the AMT program should be returned to its original home at SFO:

- Evans Center is fully occupied currently and can even expect increased demands from the Bayview Education Master Plan.
- An industrial training program such as the AMT program does not belong in a mixed-use residential/commercial neighborhood due to the environmental impacts on the

community.

--There is considerable opposition to the relocation from the Bayview/Hunters Point community, which is home to many of our students, alumni and community supporters.
--Space at SFO is evidently still available, since the affordable AMT program is likely to be replaced there by a privatized, for-profit enterprise. However, such plans were not revealed while CCSF sought to continue its program there.

The AMT program was at SFO from 1977 to 2020. The generous terms provided by the City to CCSF for use of the facilities at SFO was an investment in a generation of students. Hundreds of graduates went on to become successful as individuals as well as contributors to their communities. But, unfortunately, the CCSF leadership is pushing ahead with the unsatisfactory option of relocating the program to the Evans Center, regardless of the consequences.

With your support, however, this misguided decision can be reversed, and the AMT program can return to SFO, where it belongs. We urge you to work to return the AMT program to SFO.

Sincerely,

HIGHER EDUCATION ACTION TEAM

<https://www.ccsfheat.org>
sfcitycollegeheat@gmail.com

cc: Representative Nancy Pelosi; [Assemblymember Phil Ting](#); San Francisco Labor Council; [Kim Tavaglione](#), Executive Director, SFLC; Bradley Angel, Exec. Dir., Greenaction for Health and Environmental Justice; AFT 2121 Assembly

Responses to Letter O-2-HEAT: Higher Education Action Team

Response O-2-HEAT-1

Comment noted. A decision on the proposed Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve and carry out the proposed Project, and how to do so. No further response is required because the comment does not address significant environmental issues related to the draft IS/MND.

Response O-2-HEAT-2

See **Response I-1-Bernstein-1**.

Response O-2-HEAT-3

Comment noted. Please refer to **Response O-2-HEAT-1**. For concerns related to project's air emissions, see **Response O-1-Greenaction-1** and **Response O-1-Greenaction-7**.

Analysis of project's impact related to noise is presented in Section III.13, Noise, on page 117 of the draft IS/MND. As noted in Section III.13, noise impact associated with the proposed project during operation would be significant without mitigation. With implementation of Mitigation Measure NOI-1, project operation would be less than significant.

For concerns related to the project's impacts related to hazards and hazardous materials, see **Response I-Barish-4**.

The rest of the comment concerns political, social, or economic issues that are unrelated to the IS/MND's analysis.

Response O-2-HEAT-4

See **Response O-1-Greenaction-1** and **O-2-Greenaction-3**.

Response O-2-HEAT-5

The comment does not raise an issue related to the adequacy or accuracy of the draft IS/MND's coverage of environmental impacts under CEQA. A decision on the proposed Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this

Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve and carry out the proposed Project, and how to do so. No further response is required because the comment does not address significant environmental issues related to the draft IS/MND.

Response O-2-HEAT-6

The comment concerns political, social, or economic issues that are unrelated to the IS/MND's analysis, and does not raise an issue related to the adequacy or accuracy of the draft IS/MND's coverage of environmental impacts under CEQA. A decision on the proposed Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve and carry out the proposed Project, and how to do so. No further response is required because the comment does not address significant environmental issues related to the draft IS/MND.

INDIVIDUALS

From: Jessica Alexandra <jessica@jalexandralaw.com>

Sent: Thursday, October 28, 2021 3:33 PM

To: Facilities <facilities@ccsf.edu>

Subject: Proposed plans to relocate City College's Aviation Program to the Evans Campus

I am a big fan of City College & the opportunities it affords the residents of SF but I cannot endorse the plan to move an aviation program to Bayview/Hunters Point.

1

First, I am appalled that more was not done to inform this neighborhood of the planned relocation of this program. It is only by chance that I learned of it & have a chance to submit my comments. My neighbors have received no notice and have not had a chance to review the plans.

2

Second, I was curious to read that the planned relocation of this program to my neighborhood would have no significant environmental effects. Although the material stated this to be true, it was not clear to me how this was determined. Is it really possible that an aviation program would not have an environmental impact on a sensitive neighborhood, already the dumping ground of many toxins and radioactive waste? This seems too good to be true and frankly, not credible.

3

Third, emissions from the operation of jet engines using fuel that contains lead compounds WILL be damaging and contribute to the very least to the quality of air and pollutants. To claim that the impact is "less than significant" is again not credible.

4

Please reconsider locating this program to the Evans Campus. I understand that SFO has claimed it lacks the space to continue to house this program. Let's mobilize the mayor and the Board of Supervisors to put pressure on SFO to continue to house this program.

5

Jessica Alexandra
1618 Shafter Avenue
San Francisco 94124

Responses to I-Alexandra Letter: Jessica Alexandra

Response I-Alexandra-1

Comment noted. A decision on the proposed Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve and carry out the proposed Project, and how to do so. No further response is required because the comment does not address significant environmental issues related to the draft IS/MND.

Response I-Alexandra-2

See **Response O-1-Greenaction-1** and **Response O-2-Greenaction-2**.

Response I-Alexandra-3

See **Response I-Tubati-1** with respect to project impact related to hazards and hazardous materials.

Response I-Alexandra-4

See **Response O-2-Greenaction-1** and **Response O-2-Greenaction-7**.

Response I-Alexandra-5

See **Response I-Alexandra-1**.

From: Jean Barish <jeanbbarish@hotmail.com>
Sent: Thursday, September 30, 2021 7:35 AM
To: Facilities <facilities@ccsf.edu>; Chancellor <chancellor@ccsf.edu>; John Al-Amin <jalamin@ccsf.edu>; Thomas Boegel <tboegel@ccsf.edu>
Cc: Shanell Williams <williams.shanell@gmail.com>; tomasitamedal@gmail.com <tomasitamedal@gmail.com>; Brigitte Davila <bdavila@ccsf.edu>; John Rizzo <jrizzo@sprintmail.com>; Alan Wong <alanwong@ccsf.edu>; Thea Selby <tselby@ccsf.edu>; Aliya Chisti <achisti@ccsf.edu>; studenttrustee@mail.ccsf.edu <studenttrustee@mail.ccsf.edu>
Subject: 1400 Evans Avenue Initial Study - Public Comments

Dear Interim Associate Vice Chancellor Vasquez:

Below are my Public Comments regarding the 1400 Evans Avenue Initial Study.

I again register my complaint that there was not enough time to adequately review this study. I remain very disappointed that a request for a 30-day extension of time was denied.

Impacts that Will Be Significant and Not Mitigated

1) Biological Resources: The Project will result in the removal of approximately ten trees, which will be replaced on at least a 1-to-1 basis. There is no question that the removal of a single tree is significant in San Francisco, a city with one of the smallest tree canopies of any large US city. Replacing these trees with no more than a 1-to-1 ratio is not sufficient. Experts recommend replacing mature trees should be on a 4-to-1 ratio.

1

2) Air Quality: The Project will significantly impact air quality that cannot be mitigated. The jet fuel that will be used contains lead, a known toxin. It also contains other chemicals that are toxic. The BAAQMD Air Quality Monitoring Station is over a mile away from the project. This is unacceptable. Air Quality must be measure at the location itself, the source of the potential pollution.

2

BAAQMD consultants should have been involved with this analysis.

3) Greenhouse Gas Emissions: On p. 94 of the report you state: *Finally, the proposed project is not anticipated to result in an increase of students CCSF students* This is puzzling, and implies that if students attend the AMT program at this location, then other students in other programs will not be in attendance. That is unacceptable and must be mitigated. For months you have stated that relocating the AMT to 1400 Evans would not alter the other programs already housed there, but now you are saying something different.

3

4) Hazardous Materials: Any risk of accidents resulting in spilling hazardous materials at

4

the site is unacceptable and cannot be mitigated. This project poses a significant risk of such an accident and the spilling of hazardous materials in a neighborhood that has already suffered too much toxic dumping.

4

5) Water Quality: According to this Initial Study, the Regional Water Quality Control Board has already determined that there are many toxins in the water in this area, and has listed it as an impaired water body. Further contamination would significantly impact this area and cannot be mitigated.

5

6) Noise: There is no analysis of the impact of noise withing the building. But the AMT program will include running large airplane engines as well as doing a great deal of riveting and other noise-generating activities. These can create significant noise impacts that must be analyzed and mitigated.

6

In addition to the above comments, the Bayview/Hunters Point community and all other concerned citizens did not have enough time to adequately review this Study. Weeks after it was initially released it was determined that there was a technical problem with the weblink provided in the Study that made it impossible to retrieve it online. But despite this significant delay in the availability of the Study, the CCSF Administration gave only an 8-day extension of time to submit Public Comments. This blatantly disregards the importance of providing enough time to review the environmental impacts of this Project,, and shows a callous disregard for the importance of environmental justice in the impacted community.

7

There were numerous requests for a 30-day extension of time, but unfortunately, they were ignored. It is disheartening and of great concern that the CCSF Administration has such little regard for the potentially significant impacts of this Project that they have refused to cooperate with those most likely to be impacted. This rush to judgment is unacceptable. You are again requested to extend the time to provide public comment on this Study until October 22, 2021.

Sincerely,

Jean

Jean B Barish
Former Instructor, CCSF
jeanbbarish@hotmail.com
415-752-0185

Responses to Letter I-Barish: Jean Barish

Response I-Barish-1

As stated on Page 71 of the draft IS/MND, excavation activities to retrofit the building foundations would result in the removal of approximately ten trees. None of the trees to be removed has been identified as a significant tree. Tree removal would be subject to the Urban Forestry Ordinance (such as a street tree or significant tree) and would require a permit from the City's Public Works Department. The ordinance states that the Public Works Department shall require that replacement trees be planted (at a one-to-one ratio) or that an in-lieu fee be paid (section 806(b) of the Public Works code). In compliance with Public Works requirements, the District would submit a tree removal permit application and replace tree to be removed on a one-to-one ration.

Response I-Barish-2

See **Response O-2-Greenaction-1, Response O-2-Greenaction-7, and Response A-BAAQMD-1.**

Response I-Barish-3

The draft IS/MND adequately notes that the proposed project would not result in an increase in students at CCSF. As described in the draft IS/MND on page 20, the proposed Project would not directly result in an increase in the number of students at any of the programs or departments. The analysis assumes that the students and faculty members of the AMT Program would relocate from SFO to Evans Center. Future student growth at the programs offered at Evans Center, including the AMT Program, is estimated to be within the College's forecasted growth of the CCSF Updated Facilities Master Plan, as discussed on page 95.

As noted in Section III.8, Greenhouse Gas Emissions, of the draft IS/MND, the GHG emissions generated from jet engines and the mobile source emissions generated from staff and students traveling to the site as well as energy, area, and water source emissions generated from the AMT Program at the SFO Airport would be transferred to the Evans Center.

Response I-Barish-4

Impacts of the proposed project related to hazardous materials are analyzed in Section III.9, page 100 of the draft IS/MND. As documented in the draft IS/MND, use of hazardous materials at the project site would be in compliance with worker safety regulations under the California Occupational Safety and Health Administration (Cal/OSHA), which cover hazards related to the

prevention of exposure to hazardous materials and a release to the environment from hazardous materials use.

Storage and use of these materials during operation of the Evans Center would follow all state and local risk management requirements for hazardous materials including proper storage, use, and transport. Disposal of hazardous waste from the Evans Center would continue to be coordinated with San Francisco Department of Public Health (SFDPH), which provides pick up, transportation, and disposal of wastes. For these reasons, the project impacts related to the routine use, storage, and disposal of hazardous materials during construction and operation would be less than significant. All chemicals used on site would continue to be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (22 CCR 4.5). Therefore, the project impacts related to the routine use, storage, and disposal of hazardous materials during construction and operation would be less than significant.

All chemicals used and stored on site would continue to be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5), the Hazardous Waste Control Regulations (22 CCR 4.5), site-specific Hazardous Materials Business Plan (CA Health and Safety Code 25500-25547.8) and, if applicable, Spill Prevention Control and Countermeasures Plan (40 CFR Parts 112 and 761). Therefore, with mandatory compliance with existing laws and regulatory requirements the potential hazard to the public and the environment from reasonably foreseeable conditions involving the release of hazardous materials into the environment during construction or operation would be less than significant.

Response I-Barish-5

As noted in Section III.9, Hazards and Hazardous Materials, of the draft IS/MND, Operation of the Evans Center following construction will be subject to city and state management requirements for hazardous materials. All chemicals used and stored on site would continue to be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5), the Hazardous Waste Control Regulations (22 CCR 4.5), site-specific Hazardous Materials Business Plan (CA Health and Safety Code 25500-25547.8) and, if applicable, Spill Prevention Control and Countermeasures Plan (40 CFR Parts 112 and 761). Therefore, with mandatory compliance with existing laws and regulatory requirements the potential hazard to the public and the environment from reasonably foreseeable conditions involving the release of

hazardous materials into the environment during construction or operation would be less than significant.

Also, as noted in Section III.10, Hydrology and Water Resources, of the draft IS/MND, all project construction activities would be subject to existing regulatory requirements. Compliance with the relevant regulations and implementation of BMPs would prevent construction-related contaminants from reaching impaired surface waters and contribution to urban impacts on water quality in the San Francisco Bay. In addition, during operation, all activities at Evans Center including those of the AMT Program would comply with local and state regulations related handling and storage of the used hazardous materials and hazardous waste generated at the site, which would reduce the potential for these pollutants to reach surface waters in the vicinity through storm drains and ultimately discharge into San Francisco Bay.

Response I-Barish-6

Aircraft engines noise impact to on-site receptors was analyzed in the draft IS/MND on page 131 for informational purposes only. The reduction in noise on site with the installation of noise barriers is presented in Table 32 and described in the analysis. The document presents the findings of the analysis and notes that when mitigation is incorporated and accounting for attenuation from the exterior walls of the classroom building, noise from AMT engines could reach 5 dB(A) above ambient noise levels for turbine engines and 7 dB(A) for Prop Plane Piston Engines.

See also **Response I-Saunders-1**.

Response I-Barish-7

See **Response O-1-Greenaction-1**.

From: Harry Bernstein <riquerique@yahoo.com>

Sent: Thursday, September 30, 2021 5:04 PM

To: Facilities <facilities@ccsf.edu>

Subject: comments on Initial Study

AVC Alberto Vasquez Construction/Capital Planning

The AMT program was designed for and existed for more than 40 years in an industrial environment with ample space and without a residential neighborhood in the vicinity. The acceptance of running and testing jet engines, some of which used lead-based fuels, was tolerated and was seen as a part of daily, or at least recurring activities.

These are some of my comments.

--As far as the modifications resulting from the relocation, I notice that the Initial Study has information about current allocations, as well as interim and permanent allocations (post-construction).

1

The Department most impacted is the Motorcycle Department, a unique offering among Colleges, not only in the Bay Area but throughout California. Its existing allocation is for 3,982 square feet; the permanent allocation is 1,279 sq. ft.--a reduction of roughly 2/3. Downsizing a unique program to this degree is unreasonable and unjust.

--It is my understanding that noise pollution was evaluated external to the Evans Center. I have had it reported that the sound of riveting is ear-splitting and is probably therefore dangerous in itself and likely to interfere with surrounding activities. Also, will the sounds generated by the AMT program impact the offices just overhead?

2

--p. 12, fn .

Restrictions on the local District prohibits new housing, large office developments, limits imposed on heaviest of industrial uses.

This is an article from 2018:

3

"SFPUC Approves New \$1.3 Billion Bayview Waste Treatment Plant"

its location is 750 Phelps Street—

the distance between 750 Phelps Street, SF, 94124 and 1400 Evans Avenue, SF 94124 is roughly one half mile

<<https://hoodline.com/2018/03/sfpuc-approves-new-1-3-billion-bayview-waste-treatment-plant/>>

And more recently--

Update on the Southeast Treatment Plant:

< <https://sfpuc.org/construction-contracts/construction-projects/new-headworks-facility>>

3

Overview

As part of the Sewer System Improvement Program (SSIP), the SFPUC is investing over \$2 billion to upgrade and modernize the aging Southeast Treatment Plant (SEP) **to reduce odors**, be better prepared for earthquakes and sea level rise, and ensure operational redundancy and efficiency. When complete, the city's largest wastewater

The Evans project is not operating in a bubble and is, in fact, located in an entire community that is at risk. Some of the dangers were pointed out to you in a letter (9/30) from Greenaction which I urge you to consider.

from the Initial Study--

AMT Program

As described above, in 2021, the CCSF AMT department determined that *a radial engine would not be needed in order to be in compliance with FAA certificate requirements*. Therefore, the AMT Program at Evans Center would operate seven engines instead of eight engines originally used at SFO. The use of the radial engine would be limited to inspection and repair. Engines that would operate at Evans Center would include 2 turbine and 5 piston engines. However, the total hours of engines use for the program would not change. **The program topics that require running a reciprocating engine, such as the radial engines, would be using the Cessna (piston) engine.**

4

but later, as pointed out by Greenaction:

Page 57 of the Initial Study states: “However, the proposed project will include stationary sources of Toxic Air Contaminants (TAC) emissions from the operation of jet engines on the project site. The main pollutant of concern is lead compounds from the jet engines fueled by aviation gas (AVGAS)” (bold emphasis added)]

It is thus clear that the project would add both criteria and Toxic Air Contaminants into the environment of the community. Adding any additional pollution – especially toxics - into a neighborhood clearly overburdened and impacted by current and historic pollution is significant.

--I have made personal outreach to the Board of Trustees and the Facilities committee to urge an

5

extension of the time to comment on the Initial Study. The initial release was not as broad or effective as it should have been. It was only on about September 20-21 that a more extensive effort to reach out was made and that was only for 8 days, not a month as was asked. Greenaction was somehow overlooked and the Facilities Office even failed to notify them of the 8-day extension.

I have run out of time and will submit these few comments as is.

Harry Bernstein
235 Byxbee Street
San Francisco, CA 94132
riquerique@yahoo.com

Responses to Letter I-1-Bernstein: Harry Bernstein

Response I-1-Bernstein-1

Comment noted. Concerns regarding space allocation per program do not raise an issue related to the adequacy or accuracy of the draft IS/MND's coverage of environmental impacts under CEQA. The space allocation presented in the document is a conceptual distribution of functions among the programs that would take place at the center and could be further refined. However, the refinement of the space allocation would be carried out independent of the environmental review process and would not affect the conclusions of the draft IS/MND.

A decision on the proposed Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve and carry out the proposed Project, and how to do so.

Response I-1-Bernstein-2

See **Response I-Barish-6**.

Response I-1-Bernstein-3

CCSF is part of the California Community Colleges system, and may elect to exempt itself from local planning and zoning requirements (Government Code, section 53094). CCSF, as an agency of the state, is also exempted by the State constitution from compliance with local land use regulations, including general plans and zoning, wherever using property under its control in furtherance of its educational mission.

With regard to cumulative impacts (e.g., pollution exposure to highly vulnerable populations), all items on the Initial Study Checklist that have been checked "Less Than Significant Impact," or "No Impact" indicate that, upon evaluation, the District has determined that the proposed project could not have a significant adverse environmental effect relating to that issue. For items that have been checked "Less than Significant with Mitigation Incorporated," the District has determined that the proposed project would not have a significant adverse environmental effect with implementation of mitigation measures identified for this issue in this document. A discussion is included for issues checked "Less than Significant with Mitigation Incorporated," "Less than Significant Impact," or

“No Impact.” For each checklist item, the evaluation has considered the impacts of the project both individually and cumulatively.

Response I-1-Bernstein-4

See **Response O-2-Greenaction-1** and **Response O-2-Greenaction-7**.

Response I-1-Bernstein-5

See **Response O-1-Greenaction-1** and **O-2-Greenaction-3**.

From: Harry Bernstein <riquerique@yahoo.com>
Sent: Thursday, November 18, 2021 5:05 PM
To: Facilities <facilities@ccsf.edu>
Subject: comments on Initial Study

Dear Mr. Vasquez

It became clear during the period in late September when people were calling for a 30-day extension to allow for greater participation in comments from the residents of the Bayview/Hunters Point community that this was not something that City College leadership would endorse. Key environmental organizations were not contacted and did not receive the Initial Study, and after they did obtain it, their demands that there be a delay, an executive summary in other languages commonly used by residents of the affected community were neither acknowledged nor acceded to.

1

I am mostly underscoring community responses as to the insufficiency of the Initial Study. For instance,

> The failure to provide translation of the Notice and Executive Summaries of the key environmental review documents results in the total exclusion of many Bayview Hunters Point residents from the process. **This is a violation of language access and of state and federal civil rights laws.**

Also, by your simply excluding factors from review doesn't mean that they should be excluded. Examples:

--Bayview Hunters Point (BVHP) is a diverse, low-income community of color in Southeast San Francisco that suffers from the disproportionate burden of pollution and is at risk from climate change due to its location on the San Francisco Bay. Bayview Hunters Point is a majority-minority community; One-third of residents are African American, 30% Asian/Pacific Islander, and almost 25% Hispanic/Latino. Residents suffer high rates of infant mortality, asthma, cardiovascular diseases, and cancer. The Bay Area Air Quality Management District (BAAQMD) identifies BVHP as a "CARE" community area vulnerable to "Cumulative Impacts from Air Pollution" including 24-hour PM 2.5 exceedances.

2

--6. The State of California's CalEnviroScreen Ranks Bayview Hunters Point as one of the Communities in the State Most Vulnerable to Pollution: CalEPA's CalEnviroScreen evaluates and

ranks communities statewide based on environmental, health and socio-economic characteristic and disparities to determine vulnerability. According to CalEnviroScreen 4.0, Bayview Hunters Point ranks in the 90th percentile in terms of pollution. This means that Bayview Hunters Point has a higher pollution burden than 90% of California. For diesel particulate matter, Bayview Hunters Point falls in the 99th percentile and the 97th percentile for groundwater threats. Additionally, most of Bayview Hunters Point in within the 80th -96th percentile for hazardous waste facilities in the area, according to the CalEnviroScreen 3.0 Hazardous Waste Map. The effects of this pollution are reflected in the health of the community. Bayview Hunters Point lies in the 97th percentile for low birth weight and the 96th percentile for asthma.

--7. Initial Study's Claim of No Air Quality Impact is Incorrect: Page 24 of the Initial Study contains a check list: "ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages." The checklist indicates that there would be no potentially significant impact on air quality. We disagree strongly with that assertion. On page 32 it states there would be "Less than significant impact" on air quality. We disagree that the impact would be "less than significant." Page 57 of the Initial Study states: "However, the proposed project will include stationary sources of TAC emissions from the operation of jet engines on the project site. The main pollutant of concern is lead compounds from the jet engines fueled by aviation gas (AVGAS)" (bold emphasis added) It is thus clear that the project would add both criteria and Toxic Air Contaminants into the environment of the community. Adding any additional pollution – especially toxics - into a neighborhood clearly overburdened and impacted by current and historic pollution is significant.

2

two final points. Has it been evaluated in terms of noise having the riveting training in the Sprung structures?

3

And it is stated that to relocate the AMT program at Evans Center, it will reduce other programs. The Motorcycle Maintenance program at Evans Center is apparently unique in California. Yet according to figures on pp. 15 and 19, the 3,982 sq. ft. allocated for the program would be reduce to 1,279 sq. ft. at the end of the construction period--a reduction of 2/3. That's too high a price to pay for imposing this program, at least without a more thorough environmental review.

4

Thank you,

Harry Bernstein
riquerique@yahoo.com

Responses to Letter I-2-Bernstein: Harry Bernstein

Response I-2-Bernstein-1

See Response **O-1-Greenaction-1** and **O-2-Greenaction-2** for concerns related to the circulation and translation of the Draft IS/MND.

Response I-2-Bernstein-2

See **Response O-2-Greenaction-1** and **Response O-2-Greenaction-7** for concerns related to the air emissions impacts of the proposed project.

Response I-2-Bernstein-3

See **Response I-Barish-6** for concerns related to the project impact on on-site receptors.

Response I-2-Bernstein-4

See **Response I-1-Bernstein-1**.

From: Stephen Brady <sbrady@ccsf.edu>

Sent: Monday, September 20, 2021 1:12 PM

To: Facilities <facilities@ccsf.edu>

Cc: Alberto Vasquez <avasquez@ccsf.edu>; Rosalinda Zepeda <rzepeda@ccsf.edu>

Subject: Public comment : Evans Center Retrofitting and Modernization and Aircraft Maintenance Technology Program Relocation Initial Study / Mitigated Negative Declaration

Evans Center Retrofitting and Modernization and Aircraft Maintenance Technology Program Relocation Initial Study / Mitigated Negative Declaration

To whom it may concern,

I work at the Evans Center in the Automotive department. I made some comments at the September 1, 2021, Evans Form in which this study was presented, and I wanted to echo them here for the record.

Apart from my disappointment that a full environmental study was not done and that very little outreach too and feedback from, the local community seems to have happened, there are several issues which have been brought up, at many of the previous town halls and forms that seem to have been left out of and unaddressed in this study.

1

1. The use of small aircraft engines at the site that use “lead added” fuel. This was not addressed in the report despite being a major topic of discussion in previous forms. Lead is a serious toxin that can cause many health problems including kidney and brain damage and so its use at Evans, would be a huge health and liability issue.

2

2. Noise inside the building. The report talks about noise as it relates to outside the building (see Table 27 page 125) but fails to consider the students and staff that will be only a few yards away from the loud engines and extremely loud riveting that will take place should the AMT (Aircraft Maintenance Program) move into the Evans building. The loud riveting is not addressed at all in the study. In the new plans the administration, staff offices and conference room are just above where the AMT program is to be relocated.(page 26 and 27) The noise sound barrier mitigation does not appear to address this, focusing just on the ground floor.

3

3. The movement of the AMT program will take away space form other programs such as Motorcycle and Automotive and impact the quality and quantity of instruction in these areas. Added to this there are the many restrictions being put on the AMT program by reducing its previous space and restricting what kind of engines can be used and when they can be tested. The fundamental question that needs to be asked is can the previous high-quality instruction be maintained in all these Programs should the move go ahead?

4

Clearly these are important issues, and they need to be addressed ASAP. The fact that they have been overlooked or deemed not important enough to address in this report, indicate the need for a full more comprehensive environmental report.

5

Stephen Brady

Automotive Dept. Evans Center

Responses to Letter I-Brady: Stephen Brady

Response I-Brady-1

The draft IS/MND was determined by the District to be the appropriate level of CEQA review or environmental study for the proposed project as all identified impacts would be mitigated below the significant thresholds with mitigation and no significant unavoidable impacts were identified. No substantial evidence was found in the initial study or elsewhere in the record that the proposed Project may have a significant unavoidable effect on the environment.

See **Response O-1-Greenaction-1** for concerns related to the publication process of the draft IS/MND.

See also **Response to TH-Brady-1 through TH-Brady- 5**.

Response I-Brady-2

Air emissions including lead emissions associated with the operation of the aircraft engines was analyzed in Section III.3, Air Quality of the draft IS/MND. Please see **Response to O-2-Greenaction-1** and **O-2-Greenaction-7** for more information regarding this analysis.

Response I-Brady-3

See **Response I-Barish-6**.

Response I-Brady-4

See **Response I-1-Bernstein-1**

Response I-Brady-5

Comment noted. The purpose of the draft IS/MND analysis is to assess potential environmental impacts that would result from the development and operation of the Project with respect to the criteria established by CEQA and the *CEQA Guidelines*. Please refer to the **Response I-Brady-1**, **Response I-Brady-2**, **Response I-Brady-3**, and **Response I-Brady-4**, above.

From: Adrián Fuentes <afuent59@mail.ccsf.edu>
Sent: Friday, September 24, 2021 3:53 PM
To: Facilities <facilities@ccsf.edu>
Subject: Re: Evans Center Renovation

P.S. Pdf version

On Fri, Sep 24, 2021 at 3:51 PM Adrián Fuentes <afuent59@mail.ccsf.edu> wrote:

Dear Alberto Vasquez,

I have read the document regarding the relocation of the AMT program and made a review (attached below). Please read, consider, and implement the modifications, thank you.

9-21-21

Review
of
“Evans Retrofitting & Modernization & Aircraft Maintenance Technology Program Relocation:
Initial Study”

Dear Alberto Vasquez,

It has recently come to my attention that a series of changes are planned for the renovation of the Evans campus which houses many of the trades departments for CCSF. Of the current areas affected by the plan, the one which concerns me the most is the area dedicated to the motorcycle technician program.

Table 2 in the Evans Retrofitting and Aircraft Maintenance Technology Program Relocation: Initial Study (herein referred to as “Initial Study”) demonstrates the current area for the motorcycle courses as 3,982 square feet. The interim plan downsizes the area to 1,327 square feet (Table 4), and the permanent plan results in 1,279 square feet (Table 5). This is a reduction to 32.11% of the original (current) area.

Not only is this impractical (given the necessity of space for motorcycles, parts, tools, lifts, and adequate working area), it is also a loss for CCSF to spearhead the teaching of motorcycle technicians for the onslaught of new riders during the pandemic (and hence the increased demand for technicians to service them) (“The Pandemic Paradox: Motorcycle Sales Are Up”, cycle.world.com, retrieved 9_21_21).

Another concern is hearing damage from noise generated during aircraft engine running. Table 21 gives examples of noise levels from different environments. Table 24 gives data for turbine and piston engine decibel level (dBA), 105 and 107 dBA respectively. Page 126 (of “Initial Study”) delineates operating times for engines range from 10 - 40 minutes. OSHA refers to NIOSH (The National Institute for Occupational Safety and Health) for safe noise level recommendations (“How Loud is Too Loud?”, OSHA.gov/noise, retrieved 9_21_21). They state that for every 3 dBA increase, safe exposure time (per day) is halved. If 85 dBA for less than 8 hours is the maximum time for safe exposure, then for 106 dBA (median between aircraft engine dBA noise levels) the maximum time for safe exposure is 3.75 minutes. Operating time ranges are about 3 to 10 times longer than the recommended exposure time for safe hearing. This is highly unsafe and dangerous.

For the interim plan, the proposed ground floor configuration has the motorcycle area moved to the temporary modules on the Evans street-side of campus. What is of concern here is if there happens to be any engine operation during this time (especially in the AMT

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maintenance yard), such operation is less than 20 feet away, which will not be an appreciable decrease in dBA levels and therefore be a dangerous risk to faculty, students, and staff.

For the permanent plan, the proposed ground floor configuration places the motorcycle area in the middle of the Evans facility, adjacent to the Turbine Lab. If engine operation is only done in the AMT maintenance yard, there may be sufficient space (approx. 40 feet) for safe noise level operation to occur (given sound barriers >26 dbA reduction). However, if engine operation occurs in the Turbine Lab, the maximum distance from the southwestern corner of the proposed motorcycle area (120K) to the northwestern corner of the Turbine Lab (121C) is 30 feet. The shortest distance is 0 feet. Most likely, the distance between any faculty, students, and staff in 120K and any running engine in 121C will be within the distance range (30-0 Ft). Since the motorcycle area is next to the turbine lab, and if/when engines are operated, dBA levels will be above safe hearing levels (~106 dBA). This is highly unsafe and dangerous. A sound barrier will most definitely need to be constructed with 26-40 dBA reduction. An alternative and better option is to relocate the turbine lab significantly further away (given engine operation) and to increase the size of the area dedicated to motorcycle program. Thank you for your time and consideration.

Earnestly,
Adrián Fuentes

Responses to Letter I-Fuentes: Adrián Fuentes

Response I-Fuentes-1

See **Response I-1-Bernstein-1**.

Response I-Fuentes-2

As noted in the draft IS/MND on page 14, aircraft engines would not be operated during the interim phase. During the permanent phase, engines operation would occur only in the AMT maintenance yard that would be located in front of the hangar on the southwest corner of the building. Also, please see **Response I-Barish-6** and **Response I-Saunders-1**.

From: Janet Lohr <clayriver@earthlink.net>
Sent: Saturday, September 4, 2021 10:42 AM
To: Facilities <facilities@ccsf.edu>
Subject: Aircraft Maintenance Program

I am very concerned that the college has not planned for mitigation of noise, air quality, pollution from aircraft fuel, and impact on other programs at Evans Campus.

Yes, we need the Aircraft Maintenance program! And yes, these issues must be addressed.

Janet Lohr

Responses to Letter I-Lohr: Janet Lohr

Response I-Lohr-1

Analysis of project's impact on air quality is presented in Section III.3, Air Quality, on page 32 of the draft IS/MND. As noted in Section III.3, emissions associated with project construction and operations would be below the significance thresholds, and therefore, no mitigation measure is needed to reduce the impact.

Analysis of project's impact related to noise is presented in Section III.13, Noise, on page 117 of the draft IS/MND. As noted in Section III.13, noise impact associated with the proposed project during operation would be significant without mitigation. With implementation of Mitigation Measure NOI-1, project operation would be less than significant.

Impacts of the proposed project related to hazardous materials are analyzed in Section III.9, page 100 of the draft IS/MND. See also **Response I-Tubati-1**.

With respect to impacts on other programs within Evans Center, concerns regarding space allocation per program do not raise an issue related to the adequacy or accuracy of the draft IS/MND's coverage of environmental impacts under CEQA. The space allocation presented in the document is a conceptual distribution of functions among the programs that would take place at the center and could be further refined. However, the refinement of the space allocation would be carried out independent of the environmental review process and would not affect the conclusions of the draft IS/MND.

A decision on the proposed Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve and carry out the proposed Project, and how to do so.

For additional clarifications on the topics raised in this comment, please See **Response O-2-Greenaction-1, Response O-2-Greenaction-7, Response Barish-6, and Response I-1-Bernstein-1**.

From: Arulsevan Madhavan <amadhava@mail.ccsf.edu>

Sent: Thursday, September 23, 2021 3:19 PM

To: Facilities <facilities@ccsf.edu>

Subject: Evans Campus - Public comment on moving to Aviation department

Hello Facilities team,

I wanted to share my doubts with the decision to move the aviation department to Evans campus. I'm concerned about the pollution that we will have to go through because of this. I'd appreciate if you reconsider this decision

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Arul

Responses to Letter I-Madhavan: Arulselvan Madhavan

Response I-Madhavan-1

Comment noted. For clarifications regarding the air emissions associated with the jet engines, please see **Response O-2-Greenaction-7**.

A decision on the proposed Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve and carry out the proposed Project, and how to do so. No further response is required because the comment does not address significant environmental issues related to the draft IS/MND.

From: Jon Righthouse <jrightho@mail.ccsf.edu>

Sent: Monday, September 27, 2021 3:04 PM

To: Facilities <facilities@ccsf.edu>

Subject: Proposed Airline Maintenance facility at Evans Campus

Initial Study / Mitigated Negative Declaration

I'm currently enrolled in the Moto 93 motorcycle technician course at Evans Campus, and I have major concerns with the proposal to move the Airline Maintenance Technician program from SFO to Evans Campus.

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I'm sorry CCSF lost the space at SFO, but after reading the report, and looking at the floor plans for the future facility, Evans Campus is not an acceptable relocation site, due to space constraints, pollution from burning leaded aviation fuel, and high noise levels.

The proposed new plan reduces the space for the motorcycle tech program from almost 4000 sq ft to about 1300 sq ft.

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Space is already tight in the current motorcycle facility; have any of you visited the motorcycle space when there is a class in session? Reducing the work area to 1/3 of the current size will not work!

Table 3 on page 11 of the report shows 7 airplane engines, 2 of which are jet engines, with "hours of use per semester" totals of 63, which contradicts the vague information in the paragraph directly above it, which states:

3

"Aircraft engines are usually run about three times each semester with each engine running between 5 to 40 minutes each time"

Which of these is correct?

Do the residents of Bayview/Hunters Point (pop 35,000+) need more carcinogenic airborne pollution from burning leaded aviation fuel?

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Were they notified about this?

How much input did you get from residents on this proposal?

Moving the AMT program to the Evans campus, while downsizing the industrial arts programs already at that location is a bad plan, and it's unacceptable.

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Please do the work to find a location with more space, that is better suited to the specific needs of the AMT program.

Thank you

Jon Righthouse / Moto 93



Responses to Letter I-Righthouse: Jon Righthouse

Response I-Righthouse-1

See **Response I-1-Lohr-1**.

Response I-Righthouse-2

See **Response I-1-Bernstein-1**.

Response I-Righthouse-3

Table 3 on page 11 of the draft IS/MND adequately presents an approximate total number of hours of running the aircraft engines. This estimated number of hours was accounted for in the air quality analysis as shown in the draft IS/MND Appendix B- Air Quality Calculations, under “Jet Engine Criteria Air Pollutant Emissions.” The students begin the semester by running the engines. During the semester they would repair and or rebuild engines. After they have repaired or rebuilt the engines, they run them again. Engines will not be running every day; they are generally run during certain periods during the semester. It is estimated there would be three periods during the semester when most of the engines would be run. The draft IS/MND adequately refers to the aircraft engine running time between 5 to 40 minutes, which is the average time of each individual run. These individual average runs per engine are presented in Appendix A of the Draft IS/MND .

Response I-Righthouse-4

With respect to air emissions associated with proposed project, please see **Response O-2-Greenaction-1** and **Response O-2-Greenaction-2**.

With respect to the public notice and circulation of the draft IS/MND, please see **Response O-1-Greenaction-1**.

Response I-Righthouse-5

Comment noted. A decision on the proposed Project’s merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve

and carry out the proposed Project, and how to do so. No further response is required because the comment does not address significant environmental issues related to the draft IS/MND.

From: Andrew Saunders <asaunder@ccsf.edu>
Sent: Sunday, September 26, 2021 11:09 PM
To: Facilities <facilities@ccsf.edu>
Subject: Evans report comments

Evans report comments:

1. Noise of jet engines reported to be 106 dB, piston 107 db.

Maximum safe noise exposure to this level of sound is 3 minutes.

Source: † [National Institute for Occupational Safety and Health \(NIOSH\), "Basis for the Exposure Standard," in Publication No 98-126, *Criteria for a Recommended Standard: Occupational Noise Exposure \(1998\)*.](#)

Everyone in the building will be exposed to this engine noise.

2. Avgas used for piston aircraft engines contains lead at 2.5 grams per gallon. The engines listed use fuel at a rate up to 16 gallons per hour. Running these engines for 65 hours per semester will create massive lead pollution in the local area.

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Responses to Letter I-Saunders: Andrew Saunders

Response I-Saunders-1

As noted in the comment, the noise analysis in the draft IS/MND does state that the jet engine and prop piston engine have a sound pressure level of 105 dB(A) and 107 dB(A), respectively. However, this noise level is at a distance of 5 feet. For every doubling of distance, noise attenuates by 6 dB(A). Therefore, sound levels from a prop piston engine would drop to approximately 101 dB(A) at 10 feet, 95 dB(A) at 20 feet, and 89 dB(A) at 40 feet.

Furthermore, the draft IS/MND provides an analysis of the noise impact to receptors informational purposes. Please see **Response I-Barish-6**.

Response I-Saunders-2

See **Response O-2-Greenaction-7**.

From: Chalam Tubati <vchalam.tubati@gmail.com>

Sent: Thursday, September 30, 2021 6:12 PM

To: Facilities <facilities@ccsf.edu>

Cc: Shanell Williams <swilliams@ccsf.edu>; Tom Temprano <ttemprano@ccsf.edu>; Aliya Chisti <achisti@ccsf.edu>; Brigitte Davila <bdavila@ccsf.edu>; Thea Selby <tsselby@ccsf.edu>; Alan Wong <alanwong@ccsf.edu>; studenttrustee@mail.ccsf.edu <studenttrustee@mail.ccsf.edu>; Arieann Harrison <a.harrison@tuchs.org>; CCLP Bay Area <cclpba@gmail.com>; Evan Ling <evdling@ucsc.edu>; Madeline Dawson <madeline.dawson@berkeley.edu>; Neha Jain Patkar <nehajp@stanford.edu>; Renay Jenkins <renayjenkins@gmail.com>; SF Bay View <editor@sfbayview.com>; Tiffany Williams <Tiffany@greenaction.org>; Jean Barish <jeanbbarish@hotmail.com>; Laura Waxmann <LWaxmann@bizjournals.com>; Jessica Wolfrom <jwolfrom@sfmediaco.com>; Dizikes, Cynthia <CDizikes@sfchronicle.com>; Ida Mojadad <imojadad@sfmediaco.com>; Zsea Bowmani <zsea@nlgsf.org>; Lucas Williams <luwilliams@ggu.edu>; sammy988@aol.com <sammy988@aol.com>; Aude Bouagnon <audetojoy@gmail.com>; Dr. Raymond Tompkins <rtomp@sbcglobal.net>; John Al-Amin <jalamin@ccsf.edu>; John Rizzo <jrizzo@ccsf.edu>; KPFA News Department <news@kpfa.org>; Bay City News Datebook <bcndatebook@pacbell.net>; assignmentdesk@kqed.org <assignmentdesk@kqed.org>; Tom Molanphy <tmolanphy@hotmail.com>; LonnieM@firstgenerationehed.org <LonnieM@firstgenerationehed.org>; Margaret Gordon (margaret.woiep@gmail.com) <margaret.woiep@gmail.com>; Tyler Earl <tyler@cbeal.org>; julia@greenaction.org <julia@greenaction.org>; bvhp.ej@gmail.com <bvhp.ej@gmail.com>; Mrs. Nikcole Cunningham <mrs.nikcolecunningham@gmail.com>; Bradley Angel <bradley@greenaction.org>

Subject: Re: Comments from Greenaction, Bayview Hunters Pt. Mothers & Fathers Committee, and Marie HarrisonCommunity Foundation regarding Proposed CCSF Aircraft Maintenance Technology Program - 1400 Evans Ave.

To facilities@ccsf.edu: Below are my comments in opposition to the proposed Relocation of the CCSF's AMT program to 1400 Evans.

Bayview Hunters Point today is home to (among many other pollutant facilities & causes of pollution):

- The Wastewater Treatment plant, located near Third Street and Jerrold Ave. that treats 80% of the City's sewage, 100% of the storm water from San Francisco's combined sewer system, in addition to 100% of the waste waters of Brisbane, South San Francisco and Daly City

- Hunters Point Naval Shipyard (sometimes referred to as the 2nd biggest Superfund site in the country).
- Brownfields
- Concrete plants at the port

In addition to the above notable few:

The City has recently proposed a "Vehicle Triage Center" for the homeless near the Candlestick point (supposed to be the largest of such bringing all the vulnerable homeless to an already burdened Bayview) -

<https://www.sfchronicle.com/sf/article/Bayview-residents-now-homeless-and-living-in-16483627.php>

And now CCSF's AMT program. We should all be able to see the pattern here.

*Dr. Benjamin Chavis initially coined the term "environmental racism," but a comprehensive definition comes from Robert Bullard in his book *Dumping in Dixie*. Bullard defines environmental racism as "any policy, practice or directive that differentially affects or disadvantages (where intended or unintended) individuals, groups or communities based on race."*

Environmental racism refers to how minority group neighborhoods—populated primarily by people of color and members of low-socioeconomic backgrounds—are burdened with disproportionate numbers of hazards including toxic waste facilities, garbage dumps, and other sources of environmental pollution and foul odors that lower the quality of life. This can lead to different diseases and cancers. Because of this, as climate change worsens, minority communities will be disproportionately affected.

This is a textbook example of environmental racism by CCSF.

CCSF's own body HEAT and Green Action along with Mother's & Father's and Marie Harrison Foundation have pointed out the flaws in the study and the extreme risks the Bayview community already faces from toxic pollution. Here, I want to focus on CCSF's mission statement that says it's an institution *of* the community.

Quoting from CCSF's mission statement: <https://www.ccsf.edu/about-ccsf/city-colleges-mission-and-vision>

"...City College of San Francisco belongs to the community..."

Let's examine some of their actions wrt this proposal:

- Why is it that 17 out of 20 sites CCSF scouted for the AMT program are located in Bayview (some of them smack in the middle of homes where children play). The remaining 3 aren't far from Bayview either.
<https://www.ccsf.edu/sites/default/files/2021/document/AMT-Alternative-Location-Survey.pdf>
- Why is there new construction on the site already if this is still in the public comment period?
- Why hasn't CCSF provided documents in the languages spoken in the community in violation of civil rights laws? In other words, why has CCSF made the document in-accessible to most of the community?

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- Why hasn't CCSF provided an executive summary/notices of a whopping 150 page technical document? 5
- Why is the comment period only one month for such a long technical document, especially given CCSF failed to provide summary documents or provide them in languages spoken in the community? 6
- Why hasn't a single member of the leadership or trustees responded to our requests of extension of the comment period? I mean that's minimum & common decency, to at least say yes or no. 7
- On top of that, why did CCSF not inform me (or Bradley Angel from Green Action) about the 8 day extension on the comment period (ending today) because of the URL issue *that **we** pointed out*. One wonders if it is because we made clear our intent (in writing to CCSF) to provide public comments? Which further makes you wonder if CCSF really wants comments from the community. Did CCSF even want the community to know about this at all or is this all just a charade? 8

Does any of the above seem like the actions of an institution that boasts it "belongs to the community"?

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CCSF, at least do the right/conscientious thing now and please withdraw this proposal.

Regards,

Chalam Tubati

Professional and a resident/homeowner, Bayview Hunters Point.

p.s

It's after 5PM on Sept. 30 2021, past CCSF's ridiculous deadline for public comments. I am not sure CCSF will accept my comments. Dear facilities@ccsf.edu, please provide an ack one way or the other.

On Thu, Sep 30, 2021 at 4:04 PM Bradley Angel <bradley@greenaction.org> wrote:

Please find attached comments from the Bayview Hunters Point Mothers and Fathers Committee, Marie Harrison Community Foundation, and Greenaction for Health and Environmental Justice regarding the CCSF Aircraft Maintenance Technology Program proposed for a new location at 1400 Evans.

We object to the project being moved to the heart of Bayview Hunters Point, and object to the total lack of proper public notice and opportunities for meaningful public participation.

Responses to Letter I-Tubati: Chalam Tubati

Response I-Tubati-1

Impacts of the proposed project related to hazardous materials are analyzed in Section III.9, page 100 of the draft IS/MND. As documented in the draft IS/MND, use of hazardous materials at the project site would be in compliance with worker safety regulations under the California Occupational Safety and Health Administration (Cal/OSHA), which cover hazards related to the prevention of exposure to hazardous materials and a release to the environment from hazardous materials use.

Storage and use of these materials during operation of the Evans Center would follow all state and local risk management requirements for hazardous materials including proper storage, use, and transport. Disposal of hazardous waste from the Evans Center would continue to be coordinated with San Francisco Department of Public Health (SFDPH), which provides pick up, transportation, and disposal of wastes. For these reasons, the project impacts related to the routine use, storage, and disposal of hazardous materials during construction and operation would be less than significant. All chemicals used on site would continue to be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (22 CCR 4.5). Therefore, the project impacts related to the routine use, storage, and disposal of hazardous materials during construction and operation would be less than significant.

All chemicals used and stored on site would continue to be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5), the Hazardous Waste Control Regulations (22 CCR 4.5), site-specific Hazardous Materials Business Plan (CA Health and Safety Code 25500-25547.8) and, if applicable, Spill Prevention Control and Countermeasures Plan (40 CFR Parts 112 and 761). Therefore, with mandatory compliance with existing laws and regulatory requirements the potential hazard to the public and the environment from reasonably foreseeable conditions involving the release of hazardous materials into the environment during construction or operation would be less than significant.

Response I-Tubati-2

The comment does not raise an issue related to the adequacy or accuracy of the draft IS/MND's coverage of environmental impacts under CEQA. A decision on the proposed Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The draft IS/MND for this Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that

time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve and carry out the proposed Project, and how to do so. No further response is required because the comment does not address significant environmental issues related to the draft IS/MND.

Response I-Tubati-3

As noted on page 13 of the draft IS/MND, on January 23, 2020, the CCSF District's Board of Trustees approved a CEQA determination as a categorical Exemption for the Evans Center Renovation and Temporary Campus Project. Based on the CEQA determination, the District installed the temporary sprung and modular structures in the parking lot to temporarily house the administration offices and to provide classrooms for the programs offered at Evans Center. Current construction is associated with the installation of lavatories and other accessories for the temporary sprung and modular structures.

The responses provided herein address comments on the draft IS/MND and do not apply to previous Notices of Exemption or other projects.

Response I-Tubati-4

See **Response O-2-Greenaction-2**.

Response I-Tubati-5

The format of an IS/MND summarized the findings of the overall analysis under Section III, Environmental Factors Potentially Affected. The summary of each resource topic is provided in the Checklist at the beginning of each resource topic section.

Response I-Tubati-6

See **Response I-1-Bernstein-5, Response O-1-Greenaction-1, and Response O-2-Greenaction-2**.

Response I-Tubati-7

See **Response O-1-Greenaction-1 and Response O-2-Greenaction-3**.

Response I-Tubati-8

See **Response O-1-Greenaction-1 and Response O-2-Greenaction-3**.

Response I-Tubati-9

Comment noted. A decision on the Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this proposed Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve and carry out the proposed Project, and how to do so. No further response is required because the comment does not address significant environmental issues related to the draft IS/MND.

TOWN HALL MEETING – SEPTEMBER 1, 2021

**CCSF Evans Center AMP Relocation
Town Hall Meeting Transcription
September 1, 2021**

TH-1

I thought this was going to be a full environment report, it seems to be just like a study or something not like a full one.

TH-Brady-1

Air quality is a problem. I didn't see anywhere (I just scan report is very long) would notice about the lead that's in some of the lead petrol engines

TH-Brady-2

Things like that are they not going to teach that.
Are you going to just not have that part of the course anymore, which is, which is a terrible disservice to the students, because if they can't have that will then, it means that you know the course has been watered down, I know myself that many times when you start off in an injured industry like repairs, you know you may not get a job with a big airline right away, you might have to go to a little shop and learn how to work on small aircraft before you build up the experience get a job in a you know for a big airlines, so I was just wondering what the I didn't see it mentioned.

TH-Brady-3

with regard to running the engines, I saw that you have it on page 54, I think 53, that the number of hours that you have is it for every class that the engines are going to be one thing it told was out at about 65 hours for the Semester. Is that for each class or is that just for all of the program?

TH-Brady-4

did you were you given any information about lead engines, possibly being on or that they won't be around now.

TH-Brady-5

There were three possible conclusions and this and we've identified one of those would it be helpful to just for those of us who might not be super familiar with us to go through.

TH-Boegel-1

Was there a reason given for the omission of potential air pollution in the environmental report.
A pretty big thing to leave out.
All mission our mission is missing.
Is there a reason why?

TH-Garner-1

That the air quality was omitted from the report.

TH-Boegel-2

I didn't see it addressed thoroughly and in that report, so is going to be is that going to be provided in a follow up report or?

TH-Garner-2

Have copies of the report, been provided to the respective unions, who have Members working at Evans campus?

TH-Garner-3

Are you going to have a meet and confer with those unions, because I know that in most of our contracts does state that I mean confer should be done, especially with something this large that is going to impact, their work sites in a work environment so, are there any plans to do that

TH-Garner-4

**CCSF Evans Center AMP Relocation
Town Hall Meeting Transcription
September 1, 2021**

I still have a question about lead levels in the gasoline that's going to be used in the aircraft engines.

Piston engine, aircraft aircraft engines use leaded gasoline leaded gasoline was made illegal for automobiles in 1984 but the FAA has kept up the use of leaded gasoline. I hadn't seen anything in this report about the impact of leaded gasoline and if the engines are going to be running for 65 hours per semester per course.

That is going to put a significant amount of lead in the air in the bayview hunters point district that that's something that I asked about a year ago it doesn't seem to have been addressed and it's a it's a problem.

TH-Saunders-1

The document in a couple places notes that there are potential problems, but that there's mitigation for those problems. That's great.

What the document doesn't do is tell us what that mitigation is for any of these things so we're a little in the dark and that's why you're seeing a lot of these questions and people wondering what's going on.

TH-Finkelstein-1

What are the plans to provide enough space for the motorcycle Program?
We've been asking this for over a year.

TH-Finkelstein-2

When was this meeting first announced?

I was first made aware of it at the facilities committee meeting a couple weeks ago and it was mentioned that this will be posted on the website. It was posted on the facilities page, but not on the Evans page; and it was said that it was being sent out to the mailing list of all the people that have attended these meetings in the past, which were you know hundreds of folks and so.

TH-D'Souza-1

If we're looking for to get real copy on this report, which you know, has concerns right, particularly in a neighborhood that has had serious environmental impacts. We throw thrust upon it, and if we are addressing that appropriately and then saying it's Okay, we want to make sure that our Community is aware of that and can come to terms with that another thing is since we're talking about the air environmental concerns, particularly the air pollution.

You know, I was fortunate enough to have the privilege of being a faculty Member and talking to my fellow colleagues and I'm getting some insurance from them about what is actually going to happen should the AMT program move to that campus and what would actually be the environmental impact. But it's assurance I am getting because I have that access. Our community members, our students our other faculty members who are not getting that insurance. I'm not able to do this; it'll be great it'll be wonderful it'd be super lovely right if professionals in that community teaching in that program along with john and his team who seem to have done a pretty thorough report can explain in lay persons terms what is actually happening on the ground when these these engines are running when the noise is running and what will happen so people can understand, because you know that we're not nobody's willing to trust a big unknown entity and report without having that assurance, so if we could do something like that.

TH-D'Souza-2

**CCSF Evans Center AMP Relocation
Town Hall Meeting Transcription
September 1, 2021**

TH-1

To get the buy-in from the Community we will be able to do better in getting the acceptance of AMT program and also addressing the needs of the motorcycle program the automotive program and everybody that needs to be on that space.

TH-D'Souza-3

Thanks for clarifying that the report includes air quality impacts for both automotive engines and aircraft engines.

TH-D'Souza-4

How are you planning to mitigate the use of lead.
For Lead gasoline there are no filters that I'm aware of that can possibly filter out lead, you can have filters for a lot of other things, but not lead.

TH-Saunders-2

FAA has jurisdiction over airports, they have their absolute federal jurisdiction equivalent of waiver to allow gasoline to have lead in it; but, as I understand it, that is not going to apply anywhere else, so I really like to see this addressed I've been asking this question for more than a year.

TH-Saunders-3

I don't know if FAA has the authority to allow that gasoline be used in a non-FAA facility; that's my point I'll stop harping on about it, but I think it's a serious one.

TH-Saunders-4

California has a right to know laws that means that if any student or any person working in the building goes in there, they need to know that they're putting themselves at risk of lead and hi decibels noise level, and john, you talked about you know, putting in sound walls, for outside of the building but inside the building, you know there's classrooms on the same floor.

Also above gradient AMT program is planned to be where have our our offices our staff room even the conference room and you know that noise goes right up to the ceiling in it are high riveting noise and also the jet engine noise which is 140 decibels and anything over 94 decibels will damage your ear and they recommend not above 70 decibels so that said by the EPA and OSHA, the American speech language and hearing associations; so you know these are really important issues.

TH-Brady-6

You guys need to not take this lightly when you're thinking about moving this program into Evans Center. It's going to water down all of the programs that are there already and I don't really feel that we're being fair to the aircraft; I know, they need a place to go but we're not being fair to them if they're not allowed. I'm a teacher right and if I have to start up an engine if I do a repair on an engine and say okay guys let's start it up see if it works or maybe after change out a radiator.

You know you're not really seeing the big picture here, so what does he have to do look at a calendar, though, and Mary what is a calendar say there oh, we can start it up next week let's just leave it till next week, so the whole lesson is disrupted there, and you know those guys should be able to start up an engine whenever they feel like it; the place for that is the airport or somewhere like the airport where they're not going to interfere with anybody, so you really have to have a serious think about this gentleman before you go; this community they like to sue.

TH-Brady-7

You know you get a community like that, and they sue and you know the lawyers, they won't stop at going after the property of the College, I mean we could lose

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Evans, we could lose another property that has to be sold off the pay the compensations.

You guys, I would say talk to your insurance, if you go ahead with this, talk to your insurance person and I'd be getting myself a blanket policy to cover myself as well, so and that's all I have to say on thanks.

TH-Brady-7

I think it was February 26 of 2020. Mark Rocha spoke to the southeast Community facility Commission and one of the things he was talking at some length about what the plans were for education at city college in the southeast and he mentioned that he was expecting the aviation program to come back.

I know he is no longer here. Did Mark Rocha know something about aviation program at Evans that we haven't known and it's apparently been studied. Is there any information there that will get the quotation of what he said and send that to you later.

TH-Bernstein-1

The report the assessment says that there are potential problems but there's mitigation for those problems and none of is here.

Except for you john you are prepared to know what mitigation is what where there's mitigation where there isn't; we don't have that information.

So we can't submit educated comments on the report saying this other thing needs to be mitigated we're not able to do that because we don't have the information.

So what I'm doing is telling you that your report is wrong, I have no idea what I'm doing is trying to get the resources to evaluate what's act what that report means.

And they're sort of this cultural thing at the College right, where we have these meetings and this again john you this isn't necessarily on you right but there's this thing that happens at city college, where we have a meeting and somebody says how this thing is over here is going to be a problem, and what we hear from administration is don't worry we've taken care of it.

In this case, where we are talking about people's health.

And we're also talking about the possibilities of our academic programs to continue or not, and for our students to actually be able to get an education or not.

I'm just hearing from administration don't worry we're taking care of it; it is not sufficient, we need to actually know what those mitigation plans are and we need to know that in enough time to actually submit comment within that 30 day period so we're going to see that information pretty quick.

TH-Finkelstein-3

We had talked Alberto about 90-degree parking on mango street. Did you ever get a chance to follow up on that?

Responses to TH-1: Town Hall Meeting – September 1, 2021

Response TH-Brady-1

See **Response I-Brady-1**.

Response TH-Brady-2

See **Response O-2-Greenaction-7**.

Response TH-Brady-3

As described in the draft IS/MND on page 11, the CCSF AMT department determined that a radial engine would not be needed in order to be in compliance with FAA certificate requirement.

Response TH-Brady-4

Table 3 on page 11 of the draft IS/MND presents an approximate total number of hours of running the aircraft engines. This estimated number of hours was accounted for in the air quality analysis as shown in the draft IS/MND Appendix B- Air Quality Calculations, under “Jet Engine Criteria Air Pollutant Emissions.” The students begin the semester by running the engines. During the semester they would repair and or rebuild engines. After they have repaired or rebuilt the engines, they run them again. Engines will not be running every day; they are generally run during certain periods during the semester. It is estimated there would be three periods during the semester when most of the engines would be run. The draft IS/MND adequately refers to the aircraft engine running time between 5 to 40 minutes, which is the average time of each individual run. These individual average runs per engine are presented in Appendix A of the Draft IS/MND.

Response TH-Brady-5

The draft IS/MND presents an analysis of the Project as proposed which include the use of the aircraft engines currently needed and available for the AMT Program.

Response TH-Boegel-1

See **Response TH-Brady-4**.

Response TH-Garner-1

Air emissions including lead emissions associated with the operation of the aircraft engines was analyzed in Section III.3, Air Quality of the draft IS/MND. For more clarification related to the air quality analysis, please see **Response O-2-Greenaction-1** and **Response O-2-Greenaction-7**.

Response TH-Boegel-2

Air emissions including lead emissions associated with the operation of the aircraft engines was analyzed in Section III.3, Air Quality of the draft IS/MND. For more clarification related to the air quality analysis, please see **Response O-2-Greenaction-1** and **Response O-2-Greenaction-7**.

Response TH-Garner-2

Air emissions including lead emissions associated with the operation of the aircraft engines was analyzed in Section III.3, Air Quality, of the draft IS/MND. For more clarification related to the air quality analysis, please see **Response O-2-Greenaction-1** and **Response O-2-Greenaction-7**.

Response TH-Garner-3

See **Response O-1-Greenaction-1**.

Response TH-Garner-4

The public outreach process was conducted in compliance with the requirements under CEQA and the CEQA Guidelines for the preparation of IS/MND. For further information about the public outreach process, see **Response O-1-Greenaction-1**.

Response TH-Saunders-1

Air emissions including lead emissions associated with the operation of the aircraft engines was analyzed in Section III.3, Air Quality of the draft IS/MND. For more clarification related to the air quality analysis, please see **Response O-2-Greenaction-1** and **Response O-2-Greenaction-7**.

Response TH-Finkelstein-1

The draft IS/MND identified two impacts that would require mitigation measures to reduce these impacts below significant thresholds.

One mitigation measure, presented on page 69 of the IS/MND, is MM-BIO-1: Preconstruction Nesting Bird Surveys and Buffer Areas, would reduce the potentially significant impact during construction on nesting birds covered under the MBTA and California Fish and Game Code. As noted in the IS/MND, the implementation of this mitigation measure would reduce project impact on nesting birds below the significance thresholds.

Another identified mitigation measure is MM-NOI-1: Sound barriers for Engine Equipment, presented on page 127 of the IS/MND. As noted in the IS/MND on page 127, with implementation of MM-NOI-1, noise associated with proposed project's operation would not exceed the noise ordinance threshold of 8 dB(A) above ambient levels. Therefore, the noise impact would be less than significant.

A decision on the Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this proposed Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will consider the mitigation measures set forth in the IS/MND and the Mitigation Monitoring and Reporting Program (MMRP) and decide whether to approve and carry out the proposed Project, and how to do so. Adoption of the MMRP will be considered at that time.

Response TH-Finkelstein-2

See **Response I-1-Bernstein-1**.

Response TH-D'Souza-1

See **Response O-1-Greenaction-1** and **O-2-Greenaction-8**.

Response TH-D'Souza-2

Aircraft engines noise to on-site receptors was analyzed in the IS/MND on page 131 for informational purposes only. The reduction in noise on site with the implementation of Mitigation Measure NOI-1 that would require installation of noise barriers is presented in Table 32 and described in the analysis. The IS/MND presents the findings of the analysis and notes that when mitigation is incorporated and accounting for attenuation from the exterior walls of the classroom building, noise from AMT engines could reach 5 dB(A) above ambient noise levels for turbine engines and 7 dB(A) for Prop Plane Piston Engines.

Response TH-D'Souza-3

See **Response I-1-Bernstein-1**.

Response TH-D'Souza-4

Air emissions provided in Section III.3, Air Quality of the draft IS/MND covered operations of all existing and proposed programs at Evans Center were analyzed in. For more clarification related to the air quality analysis, please see **Response O-2-Greenaction-1** and **Response O-2-Greenaction-7**.

Response TH-Saunders-2

As presented in Section III.3, Air Quality, on page 32 of the IS/MND, the proposed project would result in less than significant impacts associated with air emissions and no mitigation measures would be required. For more clarification related to the air quality analysis, please see **Response O-2-Greenaction-1** and **Response O-2-Greenaction-7**.

Response TH-Saunders-3

It also should be noted that air emissions from construction and operation of the proposed project will be regulated by Bay Area Air Quality Management District (Air District). More specifically for this proposed project, the Air District is responsible for the issuance of air quality permits for stationary equipment in the Bay Area and the management of the resulting air emissions. Please note that certain equipment and operations (e.g., aircraft engines at the project engines) will require CCSF to apply for an Air District Authority to Construct/Permit to Operate (see **Response A-BAAQMD-1**). Also, See **Response O-2-Greenaction-1**.

Response TH-Saunders-4

See **Response TH-Saunders-3**.

Response TH-Brady-6

Level of ambient noise within the project area for the on-site occupants, before and after the implementation of the Mitigation Measure NOI-1 which requires the installation of noise barriers, have been described in Section III.13, Noise, on page 117 to page 131 of the draft IS/MND. As noted in the draft IS/MND, when mitigation is incorporated and accounting for attenuation from the

exterior walls of the classroom building (See Table 22), noise from AMT engines could reach 5 dB(A) above ambient noise levels for turbine engines and 7 dB(A) for Prop Plane Piston Engines.

The students begin the semester by running the engines. During the semester they would repair and or rebuild engines. After they have repaired or rebuilt the engines, they run them again. Engines will not be running every day; they are generally run during certain periods during the semester. It is estimated there would be three periods during the semester when most of the engines would be run. The draft IS/MND adequately refers to the aircraft engine running time between 5 to 40 minutes, which is the average time of each individual run. These individual average runs per engine are presented in Appendix A of the Draft IS/MND.

Response TH-Brady-7

Comment noted. A decision on the proposed Project's merits will be made by the CCSF Board of Trustees, who will consider all comments. The IS/MND for this Project is scheduled for consideration by the Board of Trustees on December 9, 2021. At that time, in conjunction with making any findings required under CEQA, the Board of Trustees will decide whether to approve and carry out the proposed Project, and how to do so. No further response is required because the comment does not address significant environmental issues related to the draft IS/MND.

Response TH-Bernstein-1

Public outreach process was conducted in compliance with the CEQA requirements for the preparation of IS/MND. For further information about the public outreach process, see **Response O-1-Greenaction-1**.

Response TH-Finkelstein-3

See **Response TH-Finkelstein-1**.