

San Francisco State University  
1600 Holloway Avenue  
San Francisco, CA 94132

President: Dr. Leslie Wong

Director, School of Art: Gail Dawson

Dates of Visit: April 30, May 01, 2015

In AY year 2015-16 the Art Department became the School of Art. To remain consistent with the Self Study as well as the reviewer's report, the term "Art Department" will be used in the Optional Response.

The Art Department's Optional Response to the NASAD Visitors' Report follows the procedures for *Submitting an Optional Response* to the NASAD Visitors' Report. The Content of this Response includes:

1. Corrections of errors of fact;
2. Conclusions based on such errors;
3. Documented changes made in the program since the on-site visit

The School of Art's response addresses standards issues identified in the Visitor Report and other sections.

The Reviewer's Report arrived via email on September 14, 2015, one day before the Optional Response was due to NASAD. Many changes were afoot in May 2015 when the reviewers visited. Many changes that address issues cited by the reviewers were not completed until the end of Fall 2015, thus we now respectfully submit our response.

The Department of Art wishes to thank the reviewers for their time and attention during the onsite visit. The entire self-study process was the starting place for faculty to begin charting a collective vision for the new School; providing us the opportunity reflect and assess our successes, challenges and opportunities.

## OPTIONAL RESPONSE TO VISITORS' REPORT

**COVER PAGE, page 4 paragraph 1- Programs or degrees for which renewal of Final Approval is sought:**

**Bachelor of Arts – 4 years: Art (Art History, Studio Art)**

**Bachelor of Fine Art – 4 years: Studio Art; and Visual Culture Education**

**Master of Fine Arts - 2 years: Art Studio**

### **REPLY:**

(From Self Study, page 1)

Degrees listed in the NASAD Directory for which Renewal of Plan Approval and Final Approval for Listing Requested:

Master of Fine Arts in Art – Studio – 3 years

Master of Arts in Art – Art History (on temporary suspension)

Bachelor of Arts in Art: Art Education – 4 years

Bachelor of Arts in Art: Art History – 4 years

Bachelor of Arts in Art: Studio Art – 4 years

Bachelor of Art in Art: Art History and Studio – 4 years

### **A. PURPOSES**

**Page 3, Paragraph 4 - “It appears that more than 25% of the curricula in both Interior and Apparel Design B. S. Programs can be classified as art/design.”**

### **REPLY:**

- The Chair of Consumer & Family Studies/Dietetics states that C&FS/D degrees are individualized to “meet students’ needs, thus some student programs might have 25% design but many do not.”

### **B. SIZE AND SCOPE**

**Page 4, paragraph 1 – “Though there appear to be inconsistencies with the Self Study and between the Self Study and website information related to accounting for the full and part-time faculty, gender and ethnic breakdown of the full time faculty, the faculty appears to be fairly diverse, though that diversity does not appear to currently align with the greater University population.”**

### **REPLY:**

- The Faculty Distribution by Rank and Gender chart on page 20 in the Self Study inadvertently omitted a full professor who is female.

- Faculty distribution by Age and Ethnicity accurately include all 2013-14 16 faculty. Please see ATTACHMENT B 1.
- No department, school or college at SFSU aligns with the diversity of the greater university student population, though the Art program aspires to do so.
- The Chair will take training in Talent Management in April 2016. A course learning outcome is “Capitalize on Diverse Perspectives”

2013-14	ART FACULTY	UNIVERSITY FACULTY	STUDENTS
Ethnicity	36% non-white	41% non-white	74.8% non-white
	64% white	59% white	25.2% white
Gender	36% female	48% female	52.9% female
	64% male	52% male	47.1% male

## B. SIZE AND SCOPE

**Page 4, paragraph 2 – “There is some confusion in the materials submitted regarding the number of faculty, undergraduate art and art history majors. While the Self-Study states that student enrollments in 2009 peaked with 725 majors, they have since dropped due to budget shortfall measures. The number of current majors is difficult to ascertain, as current data is expressed in degrees awarded and or SCH production.”**

### REPLY:

- Faculty numbers are corrected on page 2, **B. Size and Scope** (ATTACHMENT B 1).
- There is no evidence to support the assertion that enrollments have dropped due to budget shortfall measures. Students numbers may have dropped because many students have changed majors or graduated. The cost of living in San Francisco has affected the number of students who accept admission to SFSU.
- The College now provides the number of undergraduate majors and minors for all departments. In the year under review there were 540 undergraduate art majors. Please see ATTACHMENT B 2

## C. FINANCES

**Page 5 paragraph 4 - In attempt to balance budgets, the College has instructed department chairs to downsize class offerings, return salary savings to the College unit, and raise student/faculty ratios.**

### REPLY:

- The comment, quoted from the Self Study, does not refer to the 2013-14 academic year, nor to the budget management approach of the College of

Liberal and Creative Arts of which the Art Department has been a member since Fall 2011.

**D. GOVERNANCE AND ADMINISTRATION, 1. OVERALL EFFECTIVENESS**  
**Page 6, first bullet point – “Awareness of national initiatives on diversity was not apparent in conversation with the faculty; who could make up search committees or administration of the Department.”**

**REPLY:**

- The Art Department’s history shows it was managed in a top-down fashion and faculty had very little input on decisions confirmed by the NASAD Visitor’s Report, 2002. The department RTP Committee functioned as a *de facto* “steering committee” run by full professors. Confusion is dissipating because shared governance is now practiced in the department, but many faculty remain unaware of initiatives outside the department that do not relate directly to their teaching or research.
- In Fall 2015 new department by-laws were written by an ad hoc committee composed of faculty at all ranks. The by-laws were discussed and approved by a vote of the whole faculty in Fall 2015. They define who is eligible to serve on search committees to include chair of the committee. They align with university policies and practices. Please see ATTACHMENT D1
- All documents pertaining to governance and relevant university policies are discussed at monthly faculty meetings and posted on a password protected department blog.

**D. GOVERNANCE AND ADMINISTRATION, 1. OVERALL EFFECTIVENESS -**  
**Page 6, second bullet point – “Excessive workload was cited as primary to a limited capacity to plan and move forward, for all faculty.”**

**REPLY:**

- In Fall 2015 faculty were introduced to “Principles for Defining Normative Workloads at San Francisco State University,” which provides specifics on how the University expects faculty to divide their time among teaching, service and research. Please see ATTACHMENT D 2.
- Only 2 of the 23 California State University Campuses teach 3/3. The other 21 campuses teach 4/4. Faculty at San Francisco State University teach a three-course per semester workload.
- In mid-February 2016 a third Instructional Technician was added to the Art Department technical staff. Each tech is responsible for two studios, which has greatly reduced the maintenance work that studio faculty had been performing on top of teaching, since approximately 2007.
- ATTACHMENT D 3 shows the California State University course classification system that outlines the number of contact hours for different

sorts of courses. Nearly all of Art's studio courses were misclassified as C15, which totals 4.5 WTU's per class. WTU distribution charts for Art faculty will reflect the proper WTU's starting in Fall 2016. Please see ATTACHMENT D4, the memorandum to the university curriculum coordinator regarding these changes.

**D. GOVERNANCE AND ADMINISTRATION, 1. OVERALL EFFECTIVENESS, Page 6, third bullet point – “Quantifiable, comprehensive assessment criteria and outcomes need to be defined and articulated by faculty.”**

**REPLY:**

- In Fall 2015 the Department began program assessment under the guidance of a University consultant to develop new learning outcomes, curricula and assessment strategies. See ATTACHMENT D 5. The first semester yielded a strong draft of new Program Learning Outcomes developed with through faculty consensus, which will be honed in the coming months. Please see ATTACHMENT D6.
- In Fall 2015, the department submitted a grant to support curriculum redesign through the Teagle Foundation, which was awarded. Please see ATTACHMENTS D7 and D8. The Teagle grant also supports assessment training for four faculty members.
- New assessment strategies and plans will likely be in place by Spring 2017.

**D. GOVERNANCE AND ADMINISTRATION, 2. POLICY MAKING**

**Page 6, first bullet point - “The University’s mission is perceived by the faculty as not clearly related to the teaching and research mission and values. There appears to be no history or structure to support a research culture. This is in contradiction to Section E, MDP1 E1 “Principles for defining Normative Workloads at San Francisco State University (Self-study section iv Workload - 3/3/ and 4/4).”**

**REPLY:**

- Please see page 4, **REPLY** to Visitor’s Report page 6, second bullet point and ATTACHMENT D2

**D. 3. ART/DESIGN EXECUTIVE’S LOAD AND RESPONSIBILITIES**

**Page 6, third bullet point – “Regarding the work of the chair, support was needed to make change and the chair has had strong support from the Dean of Liberal and Creative Arts and the Dean of Undergraduate Studies. However, the chair’s professional growth has been impacted, given the scale and complexity of what appears to be a seismic shift in the structure and nature of the department. The chair could be more active administratively if additional course release was available possible.”**

**REPLY:**

- In Fall 2015 the department elected an Associate Director to assist the Director with administrating the Art Department The Dean provided the Associate Director with requisite course releases.

**E. FACULTY AND STAFF**

**Page 7, Appointment, Evaluation, Advancement – “While the process for appointment, evaluation and advancement appear to be normative there seems to be some confusion over implementing a new emphasis on research in the faculty evaluation process. New policy appears to give equal weight to teaching, research and service.**

**REPLY:**

- All faculty have been introduced to the University policy on Retention, Tenure and Promotion (RTP). The policy can be seen here: <http://senate.sfsu.edu/content/untitled-8>
- New department criteria articulates the relationship between teaching, research and service for retention, tenure and promotion process. Please see ATTACHMENTS D1 and E 1.

**E. FACULTY AND STAFF**

**Page 7, Appointment, Evaluation, Advancement – “New policy appears to give equal weight to teaching, research and service. Assistant Professors are “terrified” of the process, primarily because they find it to be ambiguous.”**

**REPLY:**

- The Dean of Faculty Affairs offers multiple faculty workshops, and regularly visits department RTP committees to answer questions. The Provost, Dean, and Dean of Faculty Affairs meet annually with RTP committees.
- The policy was developed through the Academic Senate and outlines how to convey expectations for retention, tenure and promotion to all faculty. This is reinforced at department and annual meetings.
- In Fall 2015, an ad hoc committee was formed to rewrite departmental RTP guidelines. At this writing, the document has been approved by a vote of the faculty; has been approved by the Interim Dean, and is currently under review by the Provost. Please see ATTACHMENT E 1.

**E. FACULTY AND STAFF**

**Page 7, Appointment, Evaluation, Advancement – “Senior faculty report they are not protected and not in a position to mentor professional practices of junior faculty.”**

**REPLY:**

- The SFSU policy on Retention, Tenure and Promotion, Section 1.4 Department and College Level Review Procedures, clearly defines the role of the RTP Committee in mentoring and assisting junior faculty throughout the RTP process. It concerns mentoring junior faculty throughout *the RTP process*, not mentoring “professional practices.” See ATTACHMENT E 2.
- Full professors are tenured and are eligible for cost of living increases and competitive retention increases and can undergo disciplinary procedures. A full professor would not undergo disciplinary procedures for mentoring junior faculty.
- The Art RTP Committee has revamped its priorities and for the first time is meeting with faculty during the Spring semester to guide and mentor them in completing their files/dossiers for Fall 2016. See ATTACHMENT E 3

**E. FACULTY AND STAFF**

**Page 7, Load – “Three courses each term means that many teach every single day, seven days a week.”**

- The current curriculum redesign effort will be guided by meeting the NASAD standards with awareness of the need to ease faculty workload while maintaining CSU-mandated WTU’s and serving students.
- Curriculum redesign undertaken as a whole faculty will help ensure that faculty know what is being taught in each other’s courses, thus easing the pressure they feel to “teach everything.” See ATTACHMENTS D 5 and D 6

**E. FACULTY AND STAFF**

**Page 7, Load – “Faculty observed that art creative practice proposals do not do well in university-wide grant competition with sciences and other disciplines.”**

**REPLY:**

- Five art faculty, three art historians and two studio practitioners, have applied for sabbaticals, paid leaves, and awards since Spring 2013. Two art historians were awarded semester sabbaticals and one studio faculty received a Presidential Award for New Faculty. Several art faculty have also received University small grants. ATTACHMENT E 5 is the “small grants” funding application with which faculty can apply for funding each semester. To some extent, the awarding of grants to faculty in the arts, including other arts such as Cinema, Theatre and Dance and Music, depends on the Dean’s ability to make a strong case for the arts when ranking applications.

## **E. FACULTY AND STAFF**

**Page 7, Load – “Faculty engaged with digital practice have lost funds that might keep their research and teaching on the leading edge.”**

### **REPLY:**

- All areas in the department, including digital media, lost funds when Supplies and Services funds were eliminated in 2009. The University expects Departments/Schools to apply for course fees and increases to those fees to off-set reduced support for Supplies and Services. The Department recently put forward 42 course fee increases and was approved for 38 significant increases. See ATTACHMENT E 4.
- The College can and has supported faculty research through the funding labs and course release, which the faculty engaged with digital practice received in Spring 2014. The University small grant program noted above is highly competitive nature, proposals must be specific and strong.
- Release time to support research was more freely assigned before the merger of the College of Creative Arts, the College of Humanities and the College of Behavior and Social Sciences into the College of Liberal & Creative Arts four years ago. The Interim Dean has provided additional releases as the University recovers from the Great Recession.

## **F. FACILITIES, EQUIPMENT, HEALTH, AND SAFETY**

**Page 9, bullet point 2 “Emerging Media and Technologies (formerly CIA) seem under supported in terms of contemporary technologies, social media platforms, diversity of diffused technologies, i.e., computers, tablets, smartphone technology, software.”**

### **REPLY:**

- As noted on page 5, complete curriculum redesign is underway and being funded through the Teagle Foundation. Current curriculum redesign undertaken by the department will begin to address these issues.
- All faculty who teach digital media use a college-supported computer lab. Faculty were consulted regarding peripherals and software when the lab was refurbished in 2014. See ATTACHMENT F 1.

## **F. FACILITIES, EQUIPMENT, HEALTH, AND SAFETY**

**Page 9, bullet point 5 – “Graduate students spaces appear to be adequate to support their work. But not all grads have studio space. There is a plan for summer 2015 to reallocate and rededicate studio spaces.”**

### **REPLY:**

- In summer 2015 the Interim Dean provided the Art Department \$81,000 to address a number of issues. The funds were used to move the Art Office to a converted, formerly poorly-used studio space elsewhere in the Fine

Arts building, and the old office space was converted into a graduate studio space, with adequate light, electrical supply, and ventilation. The studio has fire-approved room dividers, a shared digital work station, a common gathering place, painting storage and a “project room.” All current graduate students now have individual studio spaces and a place to gather as a group. Other funds were used to update furniture, add flat screen monitors to two classrooms. Please see ATTACHMENT F 2 for an overview of the moves.

#### **F. FACILITIES, EQUIPMENT, HEALTH, AND SAFETY**

**Page 9, bullet point 8 – “Ceramics spaces were problematic and did not appear to meet NASAD standards. Issues of concern include silica abatement, jerry rigged electrical systems (lighting), an absence of OSHA signage, no available Material Safety Data Sheets (MSDS) etc. There exist many handmade and inappropriate signs, ineffectual in giving required and workplace compliance information.”**

#### **REPLY:**

Since the site visit, EHS, university electricians, and other facilities representatives have inspected the ceramics studio, and made recommendations. Please see ATTACHEMNTS F 3 and F 4.

- Faculty member and the Instructional Technician assigned to the area have been warned not to sweep the ceramics studios and to wet mop the floors each week. The building janitorial service is now mopping the floors outside the studios.
- Major electrical upgrades for the first floor of the Fine Arts Building, which includes Ceramics, are scheduled for summer 2016. See ATTACHMENT F 2.
- Jerry-rigged electrical configurations have been removed; a new lighting system will be installed in Summer 2016 as part of a larger electrical upgrade.
- MSDS are now in a binder in a prominent location in the studio.
- Homemade signage will be replaced in Summer 2016 with proper OSHA safety information
- Clearing, cleaning and new health and safety measures will be implemented in Summer 2016.

#### **F. FACILITIES, EQUIPMENT, HEALTH, AND SAFETY**

**Page 9, bullet point 9 – “Sculpture is undersupplied in electrical power, and therefor is in need of an overhaul. No Material Safety Data Sheets were evident.”**

#### **REPLY:**

Major electrical upgrades for the first floor of the Fine Arts Building, which includes Sculpture and Ceramics, are scheduled for summer 2016. MSDS are now properly housed in a yellow binder in clear view in work areas. Please see ATTACHMENT F 4

#### **F. FACILITIES, EQUIPMENT, HEALTH, AND SAFETY**

**Page 9, bullet point 10 – “Ventilation for welding needs to be reviewed related to downward and floor ventilation of heated contaminants. No Material Safety Data Sheets were evident.”**

#### **REPLY:**

Campus EHS inspection of the welding areas in Summer 2015 indicated that welding ventilation met standards for MIG welding. MSDS are now properly housed in a yellow binder in clear view in work areas.

#### **F. FACILITIES, EQUIPMENT, HEALTH, AND SAFETY**

**Page 9, bullet point 11 – “Lecture space for projectors appear inadequate to represent the detail and specificity of visual language for art history.”**

#### **REPLY:**

- The comment refers to FA 193, a 70-seat University-controlled lecture hall in the Fine Arts Building. The university changed the bulb in Fall 2015, which has improved the clarity of projections.

#### **F. FACILITIES, EQUIPMENT, HEALTH, AND SAFETY**

**Page 9, bullet point 13 – “There is concern about the loss of dedicated space for Digital Media Arts Emerging Technologies which appears to have created a loss of identity and community for students engaged in this medium.”**

#### **REPLY:**

Please see ATTACHMENT F 2 for documentation of conditions and changes described below.

- Despite faculty efforts and complaints, the former College of Creative Arts rarely addressed ongoing facilities issues in the area when it was on the fifth floor of the Fine Arts building. Because of low enrollments in the area and what was perceived as unused space, the interim dean of the College of Liberal and Creative Art took the space from the Art Department and moved another department onto the fifth floor (page 27 of the Self Study).
- Current curriculum redesign aims to address the question of continuing low enrollments in DMET and to assess how digital media is taught in the department.

## **H. RECRUITMENT, ADMISSIONS-RETENTION, RECORD KEEPING, ADVISEMENT, AND STUDENT COMPLAINTS**

**Page 11, Record Keeping – “Appropriate files are kept on each undergraduate and graduate student from application and acceptance to graduation.”**

### **REPLY:**

- SFSU Self Study, page 41, “Undergraduate records are kept by the University’s Registrar. The policy on record keeping can be found at: [http://www.sfsu.edu/~admisrec/reg/sfsu\\_policy.html](http://www.sfsu.edu/~admisrec/reg/sfsu_policy.html).”

## **I. PUBLISHED MATERIALS AND WEB SITES**

**Page 11, paragraph 1 - “ In examining the Self, published materials and web sites, it was difficult to see that the Art Department has become a School of Art, though this information was confirmed verbally from a number of sources. That said, the visitors encourage the institution edit and align the published and interactive materials as soon as possible.**

**REPLY:**In December 2014 the Art Department voted to become the School of Art and contacted NASAD about the change. The change in the university bulletin, school email addresses, websites and other published materials reflect the change, which took effect in Fall 2015, a semester after the site visit.

## **N. PROGRAMS, DEGREES, AND CURRICULA**

**Page 14, b. Evaluation of Compliance –**

**“Bachelor of Arts – 4 years: Art (Studio Art): 120 units”**

**“Bachelor of Arts – 4 years (Art History): 120 units”**

**“Bachelor of Fine Art – 4 years: Studio Art: 125 units”**

**“Bachelor of Fine Art – 4 years: Art and Visual Culture Education: 125 units”**

### **REPLY:**

Bachelor of Arts – 4 years: Art: Concentration in Studio: 120 units

Bachelor of Arts – 4 years: Art: Concentration in Art History: 120 units

Bachelor of Arts – 4 years: Art: Concentration in Art History/Studio: 120 units

Bachelor of Arts – 4 years: Art: Concentration in in Art Education: 120 units

## **N. PROGRAMS, DEGREES, AND CURRICULA**

**Page 15, – Graduate Programs**

**“Master of Fine Art – 2 years: Art Studio”**

### **REPLY:**

Master of Fine Arts in Art – 3 years

## **N. PROGRAMS, DEGREES, AND CURRICULA**

**Page 16, paragraph 3 – “As GTA’s they get credit, but no salary.”**

### **REPLY:**

- At SFSU, GTA’s are instructors of record and are paid according to the collective bargaining agreement salary scale. GA’s are paid an hourly wage and are assigned to studio areas based on safety. Graduate students enrolled in ART 850 often work with faculty as teaching assistants and receive academic credit.

## **N. PROGRAMS, DEGREES, AND CURRICULA**

**Page 16, paragraph 7 –**

**“Department of Consumer and Family Studies/Dietetics**

**Bachelor of Science – 4 years: Interior Design**

**Apparel Design**

**Master of Arts - 1 year: Consumer and Family Studies (Interior, Apparel);**

**Industrial Arts”**

### **REPLY:**

Department of Consumer & Family Studies/Dietetics

Bachelor of Science – 4 years: Interior Design; Apparel Design

Master of Arts – 2 years: Consumer & Family Studies (Interior, Apparel)

## **P. STANDARDS SUMMARY**

**Page 18, paragraph 1 – “It is unclear how the institution meets NASAD standards regarding Facilities, Equipment, Health and Safety.”**

### **REPLY:**

- In the Visitor’s Report, page 9, bullet point 4, the reviewers stated that faculty are **“strong, productive and committed to the success of the program and students through stewardship of the studio facilities and classrooms in which they teach.”** They were particularly impressed with printmaking, digital photography and textiles facilities.
- Studios have adequate equipment and technology to support all curricular needs at the threshold level, and are appropriately specialized for advanced work. Health and Safety practices and procedures are being aligned with OSHA and NASAD safety guidelines as noted on pages 9 and 10 of the Optional response.
- Many things have been changed since the site visit. Other changes are noted above on pages 9 and 10.
- The Art Department was not a priority under the past administration, but is a clear priority of the current administration. Support is strong from the Interim Dean, the Provost and the President.

- In recent years, the Interim Dean of the College of Liberal and Creative Arts have provided:
  - A dedicated Building Manager.
  - Funding to improve facilities, infrastructure, and health and safety.
  - Funded new equipment to replace old equipment.
  - Two new tenure track hires, one in Ceramics and upcoming, in New Practices
  - Two instructional technicians under the former Associate Dean
  - A third technician in AY 2015-16
  - One 1.0, (full-time) lecturer.

Changes made in Summer 2015 have given us a beautiful new office, enough studio spaces for all our graduate students, and new flexible furniture in our studios that allows us to schedule a range of classes in different rooms. Starting in Spring 2016 the college provided funding to allow the Department to offer supervised evening studio time. Finally, the department is in the beginning stages of creating plans for regular maintenance of facilities and upkeep and replacement of equipment. We were recently funded for additional upgrading of our electrical systems.

These changes and planned changes and upgrades are creating an environment conducive to learning, and which, based on projections and plans, will enable faculty and students to focus on academic and artistic endeavors, while learning in a health and safety-conscious environment.

## **Q. OVERVIEW, SUMMARY ASSESSMENT, AND RECOMMENDATIONS FOR THE PROGRAM**

### **2. Recommendations for Short-term Improvement**

**Page 19, first bullet point, “Website and publication materials, as well as social media must be roust, well-design, and exciting and represent values of art practice, particularly as the institution commences its upcoming capital campaign.”**

#### **REPLY:**

Departments are required to adhere to university-mandated design templates. There is no dedicated web designer or web design team. Keeping web materials up to date is one of the duties of the Academic Office Coordinator.

### **2. Recommendations for Short-term Improvement**

**Page 19, third bullet point, “Sculpture is undersupplied in electrical power and requires a general overhaul.”**

#### **REPLY:**

Please see page 9 and ATTACHMENT F 4

## **2. Recommendations for Short-term Improvement**

**Page 19, fourth bullet point, “lecture space projectors are inadequate and therefore do not enable students to realize the detail and specificity of visual language offered in Art History courses.”**

### **REPLY:**

Please see page 10. A request will be made to University Academic Technology to replace the projector in FA 193, a university-controlled space in the Fine Arts Building.

**Page 20, Primary Futures Issues, bullet point 6, “There appeared to be not real sequencing of courses (basic to advanced) resulting in the absence of a shared visual language.”**

### **REPLY:**

Page 5 of the Optional Response refers to the Teagle Grant, written in Fall 2015. The first page of the grant application refers to the need to develop a common visual language and a scope and sequence to support it and the new Learning Outcomes. Please see ATTACHMENT D6.

**Page 20, Primary Futures Issues, bullet point 8, “Graduate students spaces appear to be adequate to support graduate work, although not all graduates students have access to space. This situation could become an equity issue.”**

### **REPLY:**

Please see page 8 and ATTACHMENT F 2