

9.2 COMMENT LETTERS

DEPARTMENT OF TRANSPORTATION

DISTRICT 11

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S-1

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AUG 1 2007
Facilities Planning, Design
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July 26, 2007

11-SD-8

PM 8.20

SDSU Master Plan

DEIR SCH 2007021020

Ms. Lauren Cooper
California State University, San Diego
5500 Campanile Drive
San Diego CA 92182-8080

Dear Ms. Cooper:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) for the San Diego State University (SDSU) 2007 Master Plan. Given Caltrans mission of improving mobility and our direct responsibility as owner/operator of the State Highway System, Caltrans considers itself a key stakeholder in actively working with other public agencies in determining the necessary transportation improvements to accompany land use and development decisions that affect the regional transportation network.

The SDSU Master Plan EIR should incorporate a means to identify and disclose its transportation impacts and mitigation to regional facilities, including Interstate 8 (I-8) and regional transit lines. The ultimate goal of the EIR should be to document a clear nexus between the phased implementation of the SDSU Master Plan and the identification and implementation of near-term and future projects. To that end, the preferred near-term approach by Caltrans, the San Diego Association of Governments (SANDAG), and SDSU, is to develop a Project Study Report (PSR) to address the College Avenue overcrossing and specific improvements designed to alleviate existing plus project related traffic impacts. In addition, Caltrans and SANDAG would like to obtain an agreement within the next few weeks from SDSU on a fairshare contribution to the PSR, construction of some of its identified improvements and other near-term mitigation.

S-1-1

The long-term goal and second phase of the SDSU Master Plan would ultimately address cumulative impacts by conducting an I-8 Corridor Study. The Plan would identify improvements to local and regional transportation facilities, therefore allowing these facilities to function acceptably in the future. The I-8 Corridor Plan's cumulative mitigation may include, but are not limited to, capacity enhancements, transit improvements, freight (Goods) movement development, and fair-share contributions. Therefore, it is recommended that SDSU's DEIR for the Campus Master Plan reference some participation and/or fair share on the part of SDSU to study and implement both a near-term I-8/College Avenue PSR and a long-term I-8 Corridor Study with fairshare contributions towards actual improvements identified in the studies.

S-1-2

Caltrans has the following additional comments pertaining to the traffic analysis in the DEIR:

- Figure 8-1, Alvarado Campus Project Traffic Distribution: What is the percent distribution on East and West I-8, between College Avenue to Lake Murray Boulevard, and East and West on Alvarado Road from College Avenue to Lake Murray Boulevard? — S-1-3
- Page 51, Table 9-9, Near-Term Freeway Mainline Operations Interstate 8:
 - Under the column headings Number of Lanes and Hourly Capacity in Near-Term without Project and Near-Term with Project, Fairmount Avenue to Waring Road WB shows 5M with 10,000 hourly capacity and should read 6M with 12,000 as stated previously on page 42. — S-1-4
 - Under the column heading ADT in both Near-Term without Project and Near-Term with Project, the volumes listed for Waring Road to College Avenue and Lake Murray Boulevard to Fletcher Parkway are lower than the volumes stated for Page 42, Table 9-5, Freeway Mainline Operations Existing + Project. Lake Murray Boulevard to Fletcher Parkway is lower than the existing volumes stated on Page 42, Table 9-5, Freeway Mainline Operations Existing + Project. Please clarify. — S-1-5
 - Under the column headings Peak Hour Volume AM and PM in Near-Term without Project and Near-Term with Project, at Fairmount Avenue to Waring Road EB, the AM volumes are two times higher than existing. In addition, the PM EB and WB in the same location are lower than the existing volumes as stated on Page 42, Table 9-5, Freeway Mainline Operations Existing + Project. Please clarify. — S-1-6
- Figure Page 62, Table 10-4, Horizon Year Mainline Operations Interstate 8:
 - Under the column headings Number of Lanes and Hourly Capacity in Horizon Year without Project and Horizon Year with Project, Fairmount Avenue to Waring Road WB shows 5M with 10,000 hourly capacity and should read 6M with 12,000 as stated previously on Page 42, Table 9-5, Freeway Mainline Operations Existing + Project. — S-1-7
 - Under the column headings Peak Hour Volume AM in Horizon Year without Project and Horizon Year with Project, at Fairmount Avenue to Waring Road EB, the AM volumes are two times higher than existing. For Existing volumes comparison see Page 42, Table 9-5, Freeway Mainline Operations Existing + Project. Please clarify. — S-1-8
- Please specify applicable year in all Tables and Figures, i.e., Existing=2005, Near-Term=2012, Horizon Year=2025. — S-1-9
- Page 3/4 – Please explain why the Waring Rd ramps at I-8, and the Fairmount south to I-8 EB on ramp were not included in the study area. — S-1-10
- Page 20 - (Table 5-4) Footnote A refers to Appendix B. It is not attached to this document. Should refer to Appendix D. Also, existing volumes (Peak Hour Demand) of first three ramps do not correspond with volumes shown in Figure 4-2. Please clarify. — S-1-11

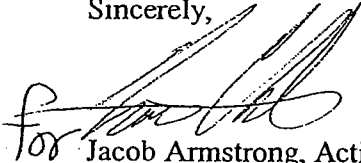
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| <ul style="list-style-type: none">• Page 51 - (Table 9-9) The AM Peak Hour Volume (2012) for EB I-8 between Fairmount Ave to Waring Road is 85% higher than what it currently is (3,946 vehicles vs. 7,340). Other segments only increased by about 5%. Please clarify. | S-1-12 |
| <ul style="list-style-type: none">• The Traffic Impact Study did not include an analysis of the Fletcher Parkway intersection with EB and WB I-8 ramps. Please explain why this intersection was not included in the study. | S-1-13 |
| <ul style="list-style-type: none">• The existing traffic volumes at the I-8 WB ramps / Parkway Drive appear low. Please consult with Caltrans to clarify these existing count volumes. | S-1-14 |
| <ul style="list-style-type: none">• Project Trip Distribution, Figure 8-8: The percentage of project trip traffic shown using I-8 (35% west of College Avenue OC and 15% east of College Avenue OC) appears low. Please clarify. | S-1-15 |
| <ul style="list-style-type: none">• SDSU should work with SANDAG and the Metropolitan Transit System to ensure that opportunities to include transit needs are studied and included in the design process for future transportation improvements, including potential issues and improvements for bicycles and pedestrians. Transportation Demand Management (TDM) strategies such as carpool and vanpool information should also be incorporated into the overall strategy. | S-1-16 |
| <ul style="list-style-type: none">• The document proposes mitigation to the I-8 and College Avenue interchange by adding a northbound lane to College Avenue towards the I-8 Eastbound on-ramp. This mitigation measure, as well as the ultimate improvements for the I-8/College Avenue interchange, needs to be further analyzed to determine the appropriate geometrics and lane configurations. Previous discussions with the City of San Diego indicated this improvement may not be physically possible because the City would not approve non-standard lane widths. | S-1-17 |
| <ul style="list-style-type: none">• Any mitigation work performed within Caltrans right of way will require an Encroachment Permit. Additional information regarding encroachment permits may be obtained by contacting our Permits Office at (619) 688-6158. Early coordination with our agency is strongly advised for all encroachment permits. | S-1-18 |
| <ul style="list-style-type: none">• If a developer proposes any work or improvements within the Caltrans right of way, the projects environmental studies must include such work. The developer is responsible for quantifying the environmental impacts of the improvements (project level analysis) and completing all appropriate mitigation measures for the impacts. The developer will also be responsible for procuring any necessary permits or approvals from the regulatory and resource agencies for the improvements. | S-1-19 |

Ms. Lauren Cooper
July 26, 2007
Page 4

Thank you again for the opportunity to be involved in this Master Plan process. If you have any questions regarding this project, please contact Trent Clark, Development Review Branch, at (619) 688-3140.

S-1-19
Cont.

Sincerely,

A handwritten signature in black ink, appearing to read "for Jacob Armstrong". The signature is stylized and written over the printed name.

Jacob Armstrong, Acting Chief
Development Review Branch



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
1011 North Grandview Avenue
Glendale, California 91201



Arnold Schwarzenegger
Governor

July 24, 2007

Ms. Lauren Cooper
Associate Director
Department of Facilities Planning, Design and Construction
Administration Building Room 130
San Diego State University
5500 Campanile Drive
San Diego, California 92182

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DRAFT ENVIRONMENTAL IMPACT REPORT FOR SAN DIEGO STATE UNIVERSITY
2007 CAMPUS MASTER PLAN REVISION, INTERSTATE 8 AND COLLEGE AVENUE,
SAN DIEGO, SAN DIEGO COUNTY, CALIFORNIA (SCH 2007021020)

Dear Ms. Cooper:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Environmental Impact Report (DEIR), dated June 2007, for the subject project. The due date to submit comments is July 26, 2007.

Based on a review of the DEIR, DTSC would like to provide the following comments:

1. If demolitions of old structures will occur, lead based paint and organochlorine pesticides from termiticides may be potential environmental concerns at the site. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC's *"Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers, dated June 9, 2006."*
2. According to the DEIR:
 - a former leaking underground storage tank was located next to Zura Hall,
 - an active gas station is located at 5111 College Avenue, and
 - former dry cleaning operations were located at 5185 College Avenue and 5924 Hardy Avenue

Because the project is school site related, DTSC recommends that an environmental review, such as Preliminary Endangerment Assessment (PEA), be

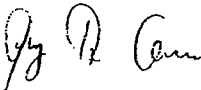
Ms. Lauren Cooper
July 24, 2207
Page 2

conducted to determine whether there has been or may have been a release or threatened release of a hazardous material, or whether a naturally occurring hazardous material is present, based on reasonably available information about the property and the area in its vicinity. The PEA should include a soil gas survey in accordance with DTSC's *"Advisory – Active Soil Gas Investigations, dated January 2003."* This environmental assessment should be conducted as part of the environmental impact report process.

S-2-2
Cont.

If you would like to discuss this matter further, please contact Ms. Ivy Guaño at (714) 484-5433 or me at (818) 551-2860.

Sincerely,



For: Ken Chiang
Senior Hazardous Substances Scientist
School Program and Engineering/Geology Support Division

cc: Mr. Guenther W. Moskat (via email)
CEQA Tracking Center – Sacramento HQ

Mr. Ken Chiang (via email)
School Program – Glendale

Ms. Ivy Guaño
School Program - Cypress

SPEGSD Reading File - Glendale

CEQA Reading File – Glendale

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

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(800) 735-2922 (Voice)

S-3



July 31, 2007

File No.: 645.07.12678.A12048

Ms. Lauren Cooper, Associate Director
Facilities Planning, Design and Construction
San Diego State University
5500 Campanile Drive
San Diego, California 92182-1624

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AUG 2 2007
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and Construction

Dear Ms. Cooper:

Re: Project SCH# 2007021020, Draft EIR, San Diego State University
2007 Campus Master Plan Revision

The San Diego Area Office of California Highway Patrol received a Draft Environmental Impact Report for the above entitled project (hereinafter DEIR). Because of our geographical proximity to the site, we have been asked by our Special Projects Section to assess traffic related matters that may affect our area operations.

According to your DEIR, "If the number of SDSU trolley riders were to remain stagnant over the next 20 years, the proposed project would generate an additional 5,607 ADT over existing vehicle trips by interim year 2012, and an additional 23,404 ADT by horizon year 2024-25."

This our primary concern since increases in the ADT will be manifested in nearby freeways within our area jurisdiction such as I-8, I-15, and SR 163. We realize that this estimated increase in ADT was qualified by SANDAG based upon an increase in trolley riders during this same period and "does not project the number of trolley riders to remain stagnant. SANDAG projects that by the year 2012, the number of SDSU trolley riders will increase to 6,669, an increase of 1,943 additional trolley riders."

In addition to the increase in ADT, a necessary concomitant of a surge in young drivers is an increase in vehicular accidents. We realize that this is a reality that society must confront but is not an aspect of an environmental document but a matter of education and training.

S-3-1

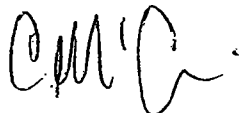
S-3-2

Ms. Lauren Cooper
July 31, 2007
Page 2

We appreciate the opportunity to comment on your plan. If you have any questions regarding this letter and our comments, please contact Lt. Sean Barrett at (619) 220-5492.

S-3-2
Cont.

Sincerely,



C. M. McGAGIN, Captain
Commander
San Diego Area

cc: Special Projects Section



U.S. Fish and Wildlife Service
 Carlsbad Fish and Wildlife Office
 6010 Hidden Valley Road
 Carlsbad, California 92011
 (760) 431-9440
 FAX (760) 431-5902 + 9618



California Department of Fish & Game
 South Coast Region
 4949 Viewridge Avenue
 San Diego, California 92123
 (858) 467-4201
 FAX (858) 467-4299

In Reply Refer To:
 FWS-SDG-5221.2

Ms. Lauren Cooper
 Associate Director
 Department of Facilities Planning, Design, and Construction
 Administration Building, Room 130
 San Diego State University
 5500 Campanile Drive
 San Diego, CA 92182-1624

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 AUG 8 2007
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Subject: Comments on the Draft Environmental Impact Report (DEIR) for the San Diego State University (SDSU) 2007 Campus Master Plan Revision, City of San Diego, San Diego County, California (SCH #2007021020)

Dear Ms. Cooper:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the DEIR for the proposed SDSU Campus Master Plan Revision. An extension of the comment period until August 1, 2007, for this DEIR was granted to the Wildlife Agencies by the SDSC Master Plan/EIR team via an electronic mail dated July 21, 2007 from Lauren Cooper. A second extension of the comment period until August 2, 2007, was granted to the Wildlife Agencies via an electronic mail dated August 1, 2007, from Lauren Cooper. We appreciate the extensions. The comments provided herein are based on information provided in the DEIR and associated documents, information provided during meetings (April 5, 2007, and July 25, 2007) and telephone correspondence with project representatives, our knowledge of sensitive and declining vegetation communities in the County of San Diego, and our participation in regional conservation planning efforts.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA) Guidelines, Sections 15386 and 15381, respectively. The Department is responsible for the conservation, protection, and management of the state's biological resources, including rare, threatened, and endangered

S-4-1

Ms. Lauren Cooper (FWS-SDG-5221.1)

Page 2

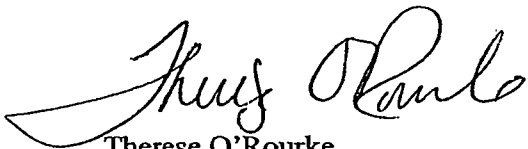
plant and animal species, pursuant to the California Endangered Species Act (CESA) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program.

The proposed project would consist of six development components: Adobe Falls Faculty/Staff Housing, Alvarado Campus, Alvarado Hotel, Student Housing, Student Union, and Campus Conference Center. The Adobe Falls Faculty/Staff Housing component would be constructed on an undeveloped site approximately 33 acres in size, located north of Interstate 8. Only the Adobe Falls component of the project would result in impacts to native vegetation (acreages of existing habitat types, proposed impacts, and proposed preservation are presented in Table 1 of Attachment 2). Construction of the remaining project components would impact only ornamental vegetation, disturbed habitat, and already developed areas. Therefore, our comments are focused on the Adobe Falls component of the proposed project.

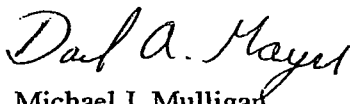
S-4-1
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We offer our recommendations and comments in the enclosure to assist SDSU in minimizing and mitigating project impacts to biological resources, and to ensure that the project is coordinated with ongoing regional habitat conservation planning efforts. We appreciate the opportunity to comment on the DEIR. If you have questions regarding this letter, please contact Ayoola Folarin of the Service (760) 431-9440 or Meredith Osborne of the Department at (858) 636-3163.

Sincerely,



Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service



Michael J. Mulligan
Deputy Regional Manager
California Department of Fish and Game

Attachments (2)

**Wildlife Agency Comments and Recommendations
On the DEIR for the SDSU 2007 Campus Master Plan Revision, City of San
Diego, San Diego County, California**

- | | |
|---|-------|
| 1. The Adobe Falls area is one of the last undeveloped portions of Alvarado Creek. The Wildlife Agencies consider the protection the integrity of this main tributary of the San Diego River a priority. In addition, this site has the potential to act as a "stepping stone" corridor between the canyons to the north and south of the site, which are in the Multi-Habitat Planning Area (MHPA) established by the City of San Diego's Multiple Species Conservation Program (MSCP). As such, the Agencies are interested in exploring project alternatives that reduce project impacts to sensitive biological resources on the Adobe Falls site. However, the draft EIR does not provide us with sufficient information to evaluate the alternatives put forth by SDSU. For example, two of the project alternatives discussed in the draft EIR include a 50% reduction in the number of housing units at the Adobe Falls site; however, the EIR does not go on to propose where the remaining units would be located. The final EIR should contain specific acreages, locations, and descriptions of the types of wetlands, coastal sage scrub, and other habitats that would potentially be affected by the project alternatives. | S-4-2 |
| 2. While the Wildlife Agencies recognize that SDSU is not signatory to the MSCP, the final EIR should evaluate the impact the project could have on the movement of species within the MHPA. | S-4-3 |
| 3. Because the project site is immediately upstream of the confluence of Alvarado Creek and the San Diego River, the final EIR should discuss potential biological impacts that may result from project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. | S-4-4 |
| 4. A nesting pair of coastal California gnatcatchers (gnatcatcher) was observed on the eastern portion of the Adobe Falls site in during non-protocol surveys in spring of 2007. Protocol surveys for gnatcatcher should be performed to ensure that all gnatcatchers on-site have been located. Since potential habitat of the federally listed as endangered least Bell's vireo (<i>Vireo bellii pusillus</i> ; vireo) occurs on-site, protocol surveys for vireo should be also performed. | S-4-5 |
| 5. If the project cannot be designed to avoid potential affects to, or take of, the gnatcatcher, consultation with the Service pursuant to section 7 (if there is a federal nexus) or section 10 of the Endangered Species Act will be required. If found on-site, the consultation should also address potential affects to the vireo. | S-4-6 |

6. Both on-site creation and enhancement, and off-site creation of riparian vegetation are proposed as mitigation for impacts to wetlands. A combination of on-site and off-site preservation is proposed as mitigation for impacts to upland vegetation. The off-site mitigation may occur on a parcel owned by SDSU on Fortuna Mountain, surrounded by the Mission Trails Regional Park, which would contribute to the assembly of the MHPA preserve system in San Diego County.

The Wildlife Agencies attended a meeting with representatives of SDSU on July 25, 2007, during which the ownership and usage history of the proposed Fortuna Mountain mitigation area was described. It is our understanding that the site was originally proposed for development prior to its purchase by SDSU. The parcel was approximately 400 acres in size at the time of purchase. Portions of the property were ultimately sold to other entities as mitigation for development projects. These portions were put into the City of San Diego's MSCP preserve and ultimately incorporated into the Mission Trails Park System. The remaining 153 acres are currently being used for outdoor educational purposes as the site of one of a number of field stations operated by the SDSU Field Stations Program. SDSU proposes to restrict or curtail student and public activities within the mitigation acreage. We request that the final EIR present an accounting of the ownership and usage history of the site and an explanation of how usage would change within the portions of the site to be preserved as mitigation. Additionally, the Wildlife Agencies should be informally (or formally, if appropriate) consulted to verify that any future authorized research will not impact habitat of sensitive species.

S-4-7

7. Implementation of the proposed project would result in direct impacts to the nesting pair and 8.77 acres of coastal sage scrub (CSS). Mitigation Measure BR-2 of the DEIR calls for offsite preservation of gnatcatcher occupied CSS habitat within the MHPA as mitigation for impacts to 8.77 acres of occupied CSS on the Adobe Falls site. At this time, no surveys for gnatcatcher have been conducted within the proposed mitigation site on Fortuna Mountain. We recommend that protocol level surveys for gnatcatcher be conducted on the property prior to finalizing the EIR. If it is determined that there is no gnatcatcher-occupied CSS on the Fortuna Mountain site, SDSU should coordinate with the Wildlife Agencies to determine alternate locations that would be appropriate for in-kind mitigation.

S-4-8

8. In meetings with the Wildlife Agencies on April 5, 2007 and July 25, 2007, Matthew Rahn, a representative of SDSU's Field Stations Program, presented the Wildlife Agencies with a proposal to utilize portions of the Adobe Falls site as a new field station. The proximity to the SDSU campus and the variety of native upland and wetland habitats and geological features present make the site a convenient place to conduct research and education programs. It is our understanding that field trips by students would be limited in number and that student access would be limited to certain areas. Educational activities would consist primarily of visual sensing as well as wildlife, air and water quality, and remote fire sensor monitoring. The restoration and management of on-site habitats would also provide an opportunity for research and education.

S-4-9

In order to facilitate analysis of potential impacts from Field Station activities on preserved open space areas within the Adobe Falls site, the final EIR should provide a description of the range of educational activities proposed. Projections of how often student groups would visit the site and the approximate numbers of students that would access the site annually should also be included. We suggest that the final EIR include a figure that maps the proposed open space areas, habitat types, and locations of sensitive animal and plant species, and includes an overlay of proposed student access points, trails, and sampling station locations.

S-4-9
Cont.

9. The DEIR does not propose any mitigation for direct impacts to 45 California adolphia plants within approximately 0.49 acre of CSS on the Adobe Falls site. The Wildlife Agencies do not concur with the conclusion that these impacts would not be significant. California adolphia is both locally and regionally sensitive. The California Native Plant Society (CNPS) has classified California adolphia as a List 2.1 species. List 2 species qualify as rare, threatened, or endangered in California, but are believed to be more common elsewhere. The extension (.1) indicates that the species is seriously endangered in California. The *Jepson Manual* (Hickman 1996) also designates the species as RARE, consistent with/based on CNPS' designation. In addition, the Department recognizes that CNPS List 1A, 1B, and 2 species may qualify for listing under the California Endangered Species Act (CESA).

Under section 15380(b) and (d) of the CEQA guidelines, if a species is not listed under CESA, it will be considered to be listed if it can be shown that, "Although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens." The CNPS classifications/designations indicate that the species is rare within California (i.e., a significant portion of its range). According to the *CNPS Inventory of Rare and Endangered Plants in California* (CNPS 2001) and the *Jepson Manual*, the only place California adolphia occurs outside California is in Baja California. According to the California Natural Diversity Database and the CalFlora Database (<http://elib.cs.berkeley.edu/calflora/>), within California, the species occurs only within San Diego County.

S-4-10

California adolphia is not a "covered" species under the MSCP. No scientific analyses have been done to demonstrate that the area to be preserved through the implementation of the MSCP would ensure the preservation in perpetuity of biologically viable populations of this species. Given the information in the preceding paragraphs, we believe that the project-related loss of the California adolphia may constitute a significant effect, and recommend that the loss should be mitigated. Therefore, we recommend that SDSU mitigate for the loss of California adolphia by implementing one of the following options.

- a. Replace impacted plants at a ratio that would result in a 1:1 compensation, using locally grown stock in a suitable location to be preserved in perpetuity.

- b. Salvage the plants proposed to be taken and translocate them to a suitable, nearby area. A qualified biologist with experience in salvaging and transplanting plants should be hired for this purpose. While the Department typically does not encourage transplantation as mitigation, we believe that it often fails because there is inadequate follow-up to ensure success.

S-4-10
Cont.

We suggest considering whether any of the on-site conserved areas would be suitable as a planting area if either or both of the latter two options are selected.

The DEIR omits the locations of California adolphia in Figure 3.3-2 (Vegetation Map with Proposed Impact Areas). These locations should be added to the map that will appear in the final document. In addition, Section 3.3.4.1 of the DEIR states that California adolphia occurs in a type of chaparral, but elsewhere, the document states that the on-site California adolphia occurs as the dominant species within a form of CSS. This should be clarified in the final EIR.

S-4-11

10. During the meeting of July 25, 2007, the proposed trail system associated with the Adobe Falls site was described as being located adjacent to the development, with one trail looping around the developed portion of the Upper Village and another around the Lower Village. The final EIR should include this more specific description of the proposed trail system and include the proposed system in figures illustrating biological resources, impacts, etc., on the Adobe Falls site.

S-4-12

11. The Resource Agencies recommend that SDSU investigate the possibility of restoring the length of Alvarado Creek that runs through the campus and the surrounding riparian areas to a more natural state (e.g., removal of non-native plants, removal of concrete from the creek bed, etc.), as this would improve the overall health of the biological resources surrounding the creek, including the wetland and riparian vegetation communities in the Adobe Falls site.

S-4-13

12. The proposed mitigation ratio for mulefat scrub is 3:1; however, in table 3.3-5 only 0.06 acre of mitigation is proposed for 0.06 acre of total impacts to mulefat scrub. At least 0.18 acre should be created/restored to mitigate for these impacts. There are a number of inconsistencies between tables 3.3-5 and 3.3-4; these two tables should be made consistent as it is currently difficult to ascertain exact acreages of impacts and mitigation for some habitat types.

S-4-14

13. The final EIR should identify any existing mitigation sites on the project site (e.g., for the City of San Diego Metropolitan Wastewater Department's Supplemental Environmental Project) and analyze the indirect and direct effects of the proposed project on these sites. In addition, the final EIR should require measures to (a) protect these resources and the biological functions and values within existing mitigation sites, and (b) mitigate for any unavoidable losses and indirect effects. Any impacts to existing mitigation sites should be mitigated at higher (i.e., at least double) than the typical mitigation ratios that would apply to

S-4-15

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| losses of habitat (e.g., 6:1 for loss of southern willow scrub rather than 3:1). Please note that existing mitigation sites cannot be used as mitigation for the current project. | S-4-15
Cont. |
| 14. The final EIR should contain figures that specify where lands to be used for habitat creation, restoration and preservation as mitigation for project impacts are located on- and off-site and descriptions of these areas. | S-4-16 |
| 15. Staging areas and access routes for construction should be described in the final EIR and included in EIR figures showing project impacts. If any temporary impacts to biological resources will result from project staging sites or construction site access, these should be described and appropriate mitigation should be proposed. | S-4-17 |
| 16. The final EIR should include a discussion regarding the regional setting, pursuant to CEQA Guidelines, § 15125(c), with special emphasis on resources that are rare or unique to the region that would be affected by the project. This discussion is critical to an assessment of environmental impacts. | S-4-18 |
| 17. We recommend that the final EIR include the following additional conditions to help avoid and minimize impacts to biological resources: | |
| <ul style="list-style-type: none"> a. Temporary fencing (with silt barriers) shall be installed around the limits of project impacts (including construction staging areas and access routes) to prevent additional habitat impacts and prevent the spread of silt from the construction zone into adjacent wetland and upland habitats to be avoided. Fencing shall be installed in a manner that does not impact habitats to be avoided. If work occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied. Any riparian/wetland or upland habitat impacts that occur beyond the approved fenced shall be mitigated at a minimum 5:1 ratio. Temporary construction fencing shall be removed upon project completion. b. The clearing and grubbing of, and construction within 500 feet of, gnatcatcher-occupied habitat shall occur outside of the gnatcatcher breeding season (March 15 to August 31, or sooner if a qualified biologist demonstrates to the satisfaction of the Agencies that all nesting is complete). c. Employees shall strictly limit their activities, vehicles, equipment, and construction materials to the fenced project footprint; d. To avoid attracting potential predators of wildlife on-site, the project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site; e. Pets of project personnel shall not be allowed on the project site; | S-4-19 |

- f. Disposal or temporary placement of excess fill, brush or other debris shall not be allowed in waters of the United States or their banks;
- g. All equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other such activities shall occur in designated areas outside of waters of the United States within the fenced project impact limits. These designated areas shall be located in previously compacted and disturbed areas to the maximum extent practicable in such a manner as to prevent any runoff from entering waters of the United States, and shall be shown on the construction plans. Fueling of equipment shall take place within existing paved areas greater than 100 feet from waters of the United States. Contractor equipment shall be checked for leaks prior to operation and repaired as necessary. "No-fueling zones" shall be designated on construction plans.

S-4-19
Cont.

18. A monitoring biologist approved by the Agencies shall be onsite during: a) initial clearing and grubbing of habitat; and b) project construction within 500 feet of preserved habitat to ensure compliance with all conservation measures. The biologist must be knowledgeable of biology and ecology of habitats and species occurring and likely to occur on-site. The biologist shall perform the following duties:

- a. To allow salvage and transplant of live plants to the mitigation-sites as practicable, ensure that clearing and grubbing of habitat is done above ground in a way that precludes nesting of birds but does not cause soil and/or root disturbance.
- b. Perform a minimum of three focused surveys, on separate days, to determine the presence of gnatcatchers in the project impact footprint outside the gnatcatcher breeding season. Surveys will begin a maximum of seven days prior to performing vegetation clearing/grubbing and one survey will be conducted the day immediately prior to the initiation of remaining work. If any gnatcatchers are found within the project impact footprint, the biologist will direct construction personnel to begin vegetation clearing/grubbing in an area away from the gnatcatchers. In addition, the biologist will walk ahead of clearing/grubbing equipment to flush birds towards areas of CSS to be avoided. It will be the responsibility of the biologist to ensure that gnatcatchers will not be injured or killed by vegetation clearing/grubbing. The biologist will also record the number and location of gnatcatchers disturbed by vegetation clearing/grubbing. The applicant will notify the Service at least seven days prior to vegetation clearing/grubbing to allow the Service to coordinate with the biologist on bird flushing activities;
- c. Be on-site during all vegetation clearing/grubbing and project construction in habitat to be impacted or within 500 feet of habitat to be avoided;

S-4-20

- | | |
|--|-------------------------|
| <ul style="list-style-type: none"> d. Oversee installation of and inspect the fencing and erosion control measures within or up-slope of restoration and/or preservation areas a minimum of once per week and daily during all rain events to ensure that any breaks in the fence or erosion control measures are repaired immediately; e. Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust; f. Train all contractors and construction personnel on the biological resources associated with this project and ensure that training is implemented by construction personnel. At a minimum, training will include: 1) the purpose for resource protection; 2) a description of the gnatcatcher and its habitat; 3) the conservation measures that should be implemented during project construction to conserve sensitive biological resources on-site, including strictly limiting activities, vehicles, equipment, and construction materials to the fenced project footprint to avoid sensitive resource areas in the field (i.e., avoided areas delineated on maps or on the project site by fencing); 4) environmentally responsible construction practices; 5) the protocol to resolve conflicts that may arise at any time during the construction process; 6) the general provisions of the Act, the need to adhere to the provisions of the Act, the penalties associated with violating the Act; g. Halt work, if necessary, to ensure the proper implementation of species and habitat protection measures. | <p>S-4-20
Cont.</p> |
| <p>19. Permanent protective fencing shall be installed along any interface with developed areas to deter human and pet entrance into on- or off-site habitat. Fencing should have no gates and be designed to prevent intrusion by pets, especially cats. Fencing should be installed prior to completion of project construction.</p> | <p>S-4-21</p> |
| <p>20. A perpetual biological conservation easement shall be executed and recorded over the all areas to be avoided/preserved on- or off-site (including any creation/restoration/enhancement areas) by the project.</p> | <p>S-4-22</p> |
| <p>21. A perpetual management, maintenance and monitoring plan shall be prepared and implemented for all on- or off-site biological conservation easement areas. The applicant shall also establish a non-wasting endowment for an amount approved by the Agencies based on a Property Analysis Record (PAR) (Center for Natural Lands Management ©1998) or similar cost estimation method to secure the ongoing funding for the perpetual management, maintenance and monitoring of the biological conservation easement area by an agency, non-profit organization, or other entity approved by the Agencies.</p> | <p>S-4-23</p> |

- | | |
|---|---------------|
| <p>22. Native plants shall be used in the project-related landscaping throughout the Adobe Falls site. Exotic plant species that should not be used anywhere on the Adobe Falls site include any species listed in the "Invasive Plant Inventory," published by the California Invasive Plant Council in February 2006. This list includes such species as: pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. A copy of the complete list can be obtained by contacting the California Invasive Plant Council at 1442-A Walnut Street, #462, Berkeley, California 94709, or by accessing their web site at http://www.cal-ipc.org.</p> | <p>S-4-24</p> |
| <p>23. If night work is necessary, night lighting shall be of the lowest illumination necessary for human safety, selectively placed, shielded and directed away from natural habitats.</p> | <p>S-4-25</p> |
| <p>24. Any planting stock to be brought onto the project site for landscape or habitat creation/restoration/enhancement shall be first inspected by a qualified pest inspector to ensure it is free of pest species that could invade natural areas, including but not limited to, Argentine ants (<i>Iridomyrmex humil</i>), fire ants (<i>Solenopsis invicta</i>) and other insect pests. Any planting stock found to be infested with such pests shall not be allowed on the project site or within 300 feet of natural habitats unless documentation is provided to the Agencies that these pests already occur in natural areas around the project site. The stock shall be quarantined, treated, or disposed of according to best management principles by qualified experts in a manner that precludes invasions into natural habitats. The applicant shall ensure that all temporary irrigation will be for the shortest duration possible, and that no permanent irrigation will be used, for landscape or habitat creation/restoration/enhancement.</p> | <p>S-4-26</p> |
| <p>25. Any brush management required for the proposed project should occur within the project footprint, and not extend into the adjacent open space.</p> | <p>S-4-27</p> |
| <p>26. A resident education program shall be developed advising residents of the potential impacts to listed species and the potential penalties for taking such species. The program should include the following topics: occurrence of the listed and sensitive species in the area; their general ecology; sensitivity of the species to human activities; how to prevent the spreading of non-native ants and other insect pests from developed areas into preserved areas; impacts from free-roaming pets (particularly domestic and feral cats); legal protection afforded these species; penalties for violations of Federal and State laws; reporting requirements; and project features designed to reduce the impacts to these species and promote continued successful occupation of the preserved areas.</p> | <p>S-4-28</p> |
| <p>27. A minimum 100-foot buffer between the development and the edge of preserved wetlands on-site should be maintained to protect biological resources within the wetlands. The buffer should not contain trails, brush management, or any man-made structures. The habitat within the buffer should be restored to the appropriate vegetation type if disturbed.</p> | <p>S-4-29</p> |

Table 1: Vegetation community types present on the Adobe Falls site, proposed impacts to vegetation on Adobe Falls site, and proposed preserved vegetation community types.					
Habitat Type/Vegetation Community	Existing area (acres)			Direct Impacts (acres)	Proposed Mitigation (acres)
	upper village site	lower village site	site total		
Wetlands					
Disturbed Sycamore/Cottonwood Riparian Woodland	0.08	0.28	0.36	0.03	0.09
Sycamore/Cottonwood Riparian Woodland	0.20	0.52	0.72	--	--
Disturbed Wetland	--	0.91	0.91	0.23	0.46
Southern Willow Scrub	0.08	0.18	0.26	0.08	0.24
Mulefat Scrub	0.06	0.35	0.41	0.06	0.06
Valley Freshwater Marsh	--	0.03	0.03	--	--
Cismontane Alkali Marsh	--	0.39	0.39	--	--
Intermittent/Ephemeral Unvegetated Stream Channel	0.02	0.06	0.08	0.08	0.16
Wetlands Subtotal:	0.44	2.72	3.16	0.48	1.01
Uplands					
Baccharis Scrub	0.09	5.05	5.14	3.75	7.50
Coastal Sage Scrub	7.62	6.36	13.98	8.77	17.54
Disturbed Coastal Sage Scrub	0.01	0.72	0.73	0.69	1.36
Southern Mixed Chaparral	1.96	4.34	6.30	3.87	3.87
Valley Needlegrass Grassland	--	0.04	0.04	0.01	0.02
Non-Native Annual Grassland	0.06	1.91	1.97	1.53	1.53
Uplands Subtotal:	10.12	19.11	29.23	19.48	30.46
Adobe Falls Faculty/Staff Housing Site Total:	10.56	21.83	32.39	19.96	31.47

PUBLIC UTILITIES COMMISSION

20 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

S-5



July 20, 2007

Lauren Cooper
The Board of Trustees of the California State University
401 Golden Shore
Long Beach, CA 90802

RECEIVED
JUL 27 2007
Facilities Planning, Design
and Construction

Dear Ms. Cooper:

Re: SCH# 2007021020; San Diego State University 2007 Campus Master Plan Revision

As the state agency responsible for rail safety within California, we recommend that any development project at Interstate 8 and College Avenue (lat= 32.779084, long= -117.066407) planned adjacent to the San Diego Trolley Inc. right-of-way be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

S-5-1

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the City.

Please advise us on the status of the project. If you have any questions in this matter, please contact me at (213) 576-7078 or at rxm@cpuc.ca.gov.

Sincerely,

Rosa Muñoz, PE
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection & Safety Division

C: Nancy Dock, San Diego Trolley Company

2007021020

STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
 SACRAMENTO, CA 95814
 (916) 653-6251
 Fax (916) 657-5390
 Web Site www.nahc.ca.gov
 e-mail: ds_nahc@pacbell.net

S-6



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 e

July 9, 2007

Ms. Lauren Cooper
The Board of Trustees of the California State University
 401 Golden Shore
 Long Beach, CA 90802

Re: SCH#2007011125; CEQA Notice of Completion; Draft Environment Impact Report (DEIR) for San Diego State University 2007 Campus Master Plan Project, San Diego County, California

Dear Ms. Cooper:

Thank you for the opportunity to comment on the above-referenced document. The Native American Heritage Commission is the state's Trustee Agency for Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

- ✓ Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/ <http://www.ohp.parks.ca.gov/1068/files/IC%20Roster.pdf>. The record search will determine:
 - If a part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded in or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission (NAHC) for:
 - A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: USGS 7.5-minute quadrangle citation with name, township, range and section.
 - The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact (APE).
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
- ✓ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.
 - CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

S-6-1

S-6-2

S-6-3

S-6-4

S-6-5

✓ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

✓ Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

S-6-5
Cont.

S-6-6

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: List of Native American Contacts



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

July 27, 2007

Lauren Cooper
The Board of Trustees of the California State University
401 Golden Shore
Long Beach, CA 90802

Subject: San Diego State University 2007 Campus Master Plan Revision
SCH#: 2007021020

Dear Lauren Cooper:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 26, 2007, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

S-7-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

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AUG 13 2007

Facilities Planning, Design
and Construction

**Document Details Report
State Clearinghouse Data Base**

SCH# 2007021020
Project Title San Diego State University 2007 Campus Master Plan Revision
Lead Agency California State University, San Diego

Type EIR Draft EIR

Description The proposed project includes six development components: (1) Adobe Falls Faculty/Staff Housing - up to 370 housing units for faculty and staff; (2) Alvarado Campus - educational and support facilities totaling approximately 612,000 gross sq. ft. of instructional and research space; (3) Alvarado Hotel - an approximately 60,000 gross sq. ft. building with up to 120 hotel rooms; (4) Campus Conference Center - meeting/conference space totaling approximately 70,000 gross sq. ft.; (5) Student Housing- student residences providing approximately 2,976 additional beds; and (6) Student Union/Aztec Center Expansion and Renovation - social space, meeting space, recreation facilities, student organization offices, food services, and retail services within renovated and expanded, by approximately 70,000 gross sq. ft., Aztec Center.

Lead Agency Contact

Name Lauren Cooper
Agency The Board of Trustees of the California State University
Phone (619) 594-5224 **Fax**
email
Address 401 Golden Shore
City Long Beach **State** CA **Zip** 90802

Project Location

County San Diego
City San Diego
Region
Cross Streets College Avenue and Interstate 8
Parcel No.

Township	Range	Section	Base
-----------------	--------------	----------------	-------------

Proximity to:

Highways I-8
Airports
Railways
Waterways
Schools
Land Use Institutional / University Campus and Park / R1-500

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Caltrans, District 11; California Highway Patrol; Department of Water Resources; Department of Fish and Game, Region 5; Department of Health Services; Office of Historic Preservation; Department of Housing and Community Development; Native American Heritage Commission; Department of Parks and Recreation; Regional Water Quality Control Board, Region 9; Resources Agency; Department of Toxic Substances Control

Date Received 06/12/2007 **Start of Review** 06/12/2007 **End of Review** 07/26/2007

Note: Blanks in data fields result from insufficient information provided by lead agency.



Linda S. Adams
Secretary for
Environmental Protection

California Regional Water Quality Control Board San Diego Region

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<http://www.waterboards.ca.gov/sandiego>

R-1

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July 27, 2007

JUL 31 2007

Lauren Cooper

Facilities Planning, Design
and Construction

Associate Director, Department of Facilities Planning, Design and Construction
Administration Building, Room 130
San Diego State University
5500 Campanile Dr.
San Diego, CA 92182-1624

Dear Ms. Cooper:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT SDSU CAMPUS MASTER PLAN REVISION

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the SDSU Campus Master Plan Revision. In formulating building plans, the San Diego Regional Water Quality Control Board (San Diego Water Board) expects the project proponents to avoid impacts to waters of the U.S. wherever possible, minimize impacts where they cannot be avoided, and propose effective mitigation wherever impacts cannot be minimized. Please note that it is unlikely that the San Diego Water Board will issue a Clean Water Act section 401 Certification if the project involves paving over natural creek beds or the placement of creeks underground. Some specific comments are discussed below.

R-1-1

Change in Hydrology

Table 3.7-3 of the DEIR describes summaries of storm event peak flows for both pre- and post-construction conditions. According to the table, the construction of both the Adobe Falls Faculty/Staff Housing and the Campus Conference Center will likely increase the peak flow for sizeable storm events.

An analysis of hydrology should include hydrographs depicting flow throughout the duration of a storm and quantify the duration of flows and total volume of water generated. Erosion occurs not only from peak flow runoff but also from extended non-peak flow runoff (i.e. the steady flow generated from the duration of a storm). Pre-development hydrology should be mimicked not only for peak flows, but also flow duration, volume, and velocity. In addition, the analysis should predict the critical shear stress caused by the post-construction flow and compare it to the stability threshold for the channel, as this will aid in predicting whether the channel will erode as a result of

R-1-2

California Environmental Protection Agency

July 27, 2007

receiving runoff from the project. If necessary, flow control measures should be implemented to avoid erosion of the channel.

R-1-2
Cont.

Incorporation of Low-Impact Development Concepts

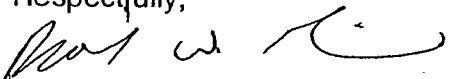
We are pleased to see mitigation measures discussed in accordance with the City of San Diego's Storm Water Standards Manual, which discusses both incorporation of Low Impact Development (LID) concepts and post-construction BMPs. Please note that many LID concepts must be implemented wherever they are applicable and feasible. Also, all structural post-construction BMPs should be designed to mitigate (infiltrate, capture, or treat) the volume of water generated by the 85th percentile storm event.

In addition to the Standards Manual, you may also find the resources in Attachment 1 helpful in choosing LID materials and design concepts. Finally, the County of San Diego is developing a Low Impact Development Handbook, which can be viewed at http://www.sdcounty.ca.gov/dplu/LID_PR.html. Although this Handbook is currently in draft form, we expect it to be a useful tool for new construction projects in identifying suitable project designs that would minimize adverse impacts to water quality.

R-1-3

We look forward to working with you on this project. If you have any questions, please contact Ms. Christina Arias at (858) 627-3931 or carias@waterboards.ca.gov.

Respectfully,



David Gibson
Senior Environmental Scientist
Southern Watershed Protection Unit

Low-Impact Development References

Low-impact (LID) development generally involves more compact development that:

- minimizes generation of urban pollutants;
- preserves the amenity and other values of natural waters;
- maintains natural waters, drainage paths, landscape features and other water-holding areas to promote stormwater retention and groundwater recharge;
- designs communities and landscaping to minimize stormwater generation, runoff, and concentration; promote groundwater recharge; and reduce water demand;
- promotes water conservation and re-use.

The following documents are among many that provide more specific guidance in LID.

Bay Area Stormwater Management Agencies Association. Start at the Source. 1999. Online: <http://www.basmaa.org/index.cfm>.

Center for Watershed Protection. Better Site Design: A Handbook for Changing Development Rules in Your Community. August 1998. Online: <http://www.cwp.org/>.

Local Government Commission. The Ahwahnee Water Principles: A Blueprint for Regional Sustainability. July 2006. Online: <http://water.lgc.org/guidebook>.

Prince George's County, Maryland, Department of Environmental Protection. Low-Impact Development Design Strategies. January 2000.

Prince George's County, Maryland, Department of Environmental Protection. Low-Impact Development Hydrologic Analysis. January 2000.

United States Environmental Protection Agency. Using Smart Growth Techniques as Stormwater Best Management Practices. EPA 231-B-05-002. December 2005.

United States Environmental Protection Agency. Parking Spaces/Community Places. EPA 231-K-06-001. January 2006.

United States Environmental Protection Agency. Protecting Water Resources with Higher Density Development. EPA 231-R-06-001. January 2006.

United States Environmental Protection Agency. Growing Toward More Efficient Water Use: Linking Development, Infrastructure, and Drinking Water Policies. EPA 230-R-06-001. January 2006.

Further Online References:

Ca. Office of Environmental Health Hazard Assessment: <http://www.oehha.ca.gov/ecotox.html>

United States Environmental Protection Agency: <http://www.epa.gov/smartgrowth/>



401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
www.sandag.org

August 8, 2007

R-2
RECEIVED
AUG 16 2007
Facilities Planning, Design
and Construction
File Number 7000300

Mr. Anthony Fulton, Director
Department of Facilities Design, Planning, and Construction
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Dear Mr. Fulton:

SUBJECT: 2007 Campus Master Plan Draft Environmental Impact Report

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the San Diego State University (SDSU) Master Plan. We also appreciate having had the opportunity to meet you and your traffic engineering consultant to discuss the impacts of the Master Plan on regional transportation facilities. SANDAG has reviewed the DEIR relative to its direct, indirect, and cumulative impacts on the regional transportation system. As the Congestion Management Agency for the San Diego region, SANDAG is required to analyze the effects of local land use decisions on the Congestion Management Program transportation system. In addition, SANDAG's 2004 Regional Comprehensive Plan (RCP) calls for coordinating regional infrastructure improvements with local development, and for focusing development in smart growth areas that are served by public transit. SANDAG is also responsible for transit planning for the region and for preparation of the long-range Regional Transportation Plan. Our comments are related to these responsibilities and relevant regional plans and policies.

SANDAG staff has major concerns with the overall approach taken in the DEIR to assessing the Master Plan's impacts on transportation facilities and to providing for mitigation measures. For example, the traffic study assumes a high level of transit mode share while failing to address capacity limitations of the system to absorb the projected transit trips. Consequently, the traffic study understates traffic impacts and does not adequately mitigate for those impacts in the short or long term.

The DEIR attempts to provide both a project-level analysis of near-term development impacts and a programmatic analysis of the impacts of campus improvements over the Plan's 25-year planning horizon. Therefore, the DEIR should identify and mitigate for both the specific impacts of Phase I projects and the long-term impacts of the Master Plan. Project-specific impacts should be mitigated with specific transit, highway, and roadway improvements that are implemented by the University. Long-term impacts should be mitigated through a combination of project-specific improvements and by participating

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R-2-1

R-2-2

R-2-3

in the construction and/or funding of regional transportation facilities and services at a fair-share level. Mitigation for long-term impacts should be phased in with build-out of the campus, and should include a monitoring program to evaluate the success of the mitigation measures and be adjusted when necessary. In light of recent cases such as City of Marina v. Board of Trustees of the California State University, 138 P.3d 692 (2006), and County of San Diego v. Grossmont-Cuyamaca Community College Dist., 141 Cal. App. 4th 86 (2006), SDSU is obligated to make incremental improvements to the local and regional transportation system as it makes incremental improvements to the campus in order to mitigate the impacts of its projects on the transportation system.

R-2-3
Cont.

Traffic Analysis

We have three main concerns about the traffic analysis: (1) it greatly understates trip generation, (2) it assumes a high proportion of trips accommodated by transit without addressing the needed capital and operating support necessary to attain that mode split, and (3) it refers to generalized "fair share contributions" to transportation capital improvements to mitigate traffic impacts, rather than ensuring that the needed infrastructure will be built.

1) *Understated Trip Generation.* The DEIR (Table 3.14-14A) uses extremely low trip generation rates of 2.47 daily trips per non-resident student and 0.64 daily trips per resident student. In addition, the 0.64 rate for resident students is extremely low and should be revised to a more credible rate that is supported by data. The discussion of the trip generation methodology (3.14-31 and 3.14-32) seems to indicate that only vehicular trips are being captured, and only those trips that enter campus parking areas are being counted. This understates the actual trip generation by excluding trips that did not enter a measured campus parking lot (deliveries, business, drop-offs, parked elsewhere, etc.). The analysis excludes trips made by carpooling, bicycling, walking, bus and trolley. These missed trips should have been measured or estimated, and then added to, and not subtracted from, the 2.47 rate for a true total trip generation as seems to have been done in Tables 3.14-14B, 3.14-14C, 3.14-15B, and 3.14-15C. The trip generation analysis should include all trips by all modes generated by the campus. Mode splits may then be realistically calculated to determine the trips that will be made by each mode.

R-2-4

2) *Transit Trip Assumptions.* The analysis includes an unsupported assumption that one-half of the growth in vehicular trips generated by the campus growth will be handled by transit. This assumption is based on the SANDAG model's estimate of future boarding growth at the SDSU trolley station. The SANDAG model projects demand for transit travel unconstrained by the limitations of the system's capacity. We are skeptical that the projected 10,000 additional transit trips can be absorbed by the system without infrastructure and operational improvements to the trolley and bus system. While we support any effort to meet the University's future travel needs with transit, the DEIR must address the impacts of the demand growth on transit and assess SDSU's responsibility to provide improvements to mitigate those impacts.

R-2-5

3) *Inadequate Mitigation Measures.* The Master Plan and EIR should identify mode split targets for 2030 and intermediate years, and include specific measures geared toward achieving those targets. The DEIR should include a plan for capital and operating improvements that mitigate for additional demand and any negative impacts to current transit operations as a result of SDSU's plans. For example, the capacity of the trolley infrastructure and services should be evaluated, and mitigation

R-2-6

measures should be proposed, such as improvements to track, rolling stock, and station infrastructure, or additional service to address capacity issues. These measures should be identified in consultation with the Metropolitan Transit System.

R-2-6
Cont.

Bus service impacts should also be mitigated from a service and infrastructure need. Cost increases due to service expansion or any negative impacts to current operations should be mitigated. Critical capital improvements for buses should include a bus-only signal for a left turn from the transit center onto College Avenue. This improvement was previously included in the Paseo EIR and should be included in this EIR in the Phase I list of projects, as it is critically needed to move buses through the transit center and eliminate unnecessary delay. Additional improvements that should be considered are:

- an expansion or re-design of the bus transit center to accommodate more buses
- the installation of ticket vending machines and next-bus signs, which provide for some expansion of capacity through faster boarding and cycling of buses
- an enhanced shelter for the Mid-City Rapid Bus terminal, which will provide a fast connection between SDSU, the Mid-City communities, Balboa Park, and downtown
- provision of transit passes to all students through a special student assessment to enable students to ride transit at a cost that they perceive as "free"
- shuttles to remote parts of campus and to nearby student housing.

R-2-7

The DEIR should also clearly identify and mitigate the plan's transportation impacts on Interstate 8 (I-8) and identify mitigation measures. Since the DEIR covers both near-term projects that will have impacts on the highway, and subsequent campus development that will have longer term impacts, the EIR should include both near-term and long-term mitigation measures. SANDAG supports Caltrans' request in its letter dated July 26, 2007, that SDSU contribute to and cooperate in a Project Study Report (PSR) that will analyze how to accommodate increased traffic at I-8 and College Avenue, along with a commitment by SDSU to participate in implementing the PSR improvements in the short term. As the long-term plan is implemented, impacts will extend beyond the interchange at College Avenue. Therefore, SDSU should also contribute to a study of the I-8 corridor, and be prepared to pay for traffic mitigations based on the study results.

R-2-8

In addition, traffic improvements on the city streets approaching and along the perimeter of the campus should be designed to improve both auto and transit access to the campus. Improvements that are needed to mitigate the Phase I projects should not be "fair share" items, but fully funded and completed by the University. Also, key sidewalks (e.g., Alvarado Road), pedestrian bridges (e.g., College Avenue at Canyon Crest, over Interstate 8 near College Avenue and/or the proposed Adobe Village), and a bikeway network should be included as capital improvements funded and/or built by the University.

R-2-9

Additional Planning Considerations

It should be noted that, as part of the implementation of the RCP, SANDAG has developed a draft Smart Growth Concept Map that identifies locations for smart growth development, including the SDSU campus. The campus should focus development around public transit and support a variety of

R-2-10

transportation choices. In addressing the trip generation impacts of the planned expansion, the DEIR proposes mitigation measures aimed solely at improving motor vehicle access. Given the limited ability to expand the road network, the DEIR should take a more balanced approach to mobility, and provide mitigation measures supporting all modes of travel.

R-2-10
Cont.

New development should be focused within the campus on top of the mesa to facilitate pedestrian access to campus facilities. While motor vehicle access to the campus will continue to be important, and will have significant impacts on the roadway system around the campus, the decision to provide motor vehicle access improvements such as added right-turn lanes should be reconsidered in light of their impacts on pedestrians and bicyclists. Multiple right-turn lanes threaten pedestrian crossing safety and make it difficult to provide continuous bike lanes at intersections.

R-2-11

The DEIR should propose improvements to non-motorized access as mitigation. It should identify pedestrian volumes and propose street crossing improvements where demand warrants. Any proposed changes to the street network should preserve existing bicycle facilities and provide any planned improvements included in the City of San Diego Bicycle Master Plan. In addition, the DEIR should propose on-campus improvements to bicycle access to encourage bicycle trips. Improvements could include enhanced bike parking, improved on-campus bicycle circulation, and bicycle education and encouragement programs.

R-2-12

Design improvements should be made by the Master Plan to encourage alternative modes of travel. The Adobe Falls development should be designed with a commitment to transit-oriented design features, shuttle service to campus implemented at the start of the project, neighborhood parking protections, and traffic calming.

R-2-13

Finally, in order to address the issues outlined above in a comprehensive manner, SANDAG encourages SDSU to begin preparation of a long-range Campus Transportation Plan to address access to the campus over its 25-year planning horizon. The Campus Transportation Plan should assess the long-term access needs to the campus, including its likely origins and connections to the surrounding communities, and develop strategies for its accommodation. These strategies could include measures such as new student housing, additional infrastructure for roads, highways, transit, and other modes, internal shuttles, and transportation demand management. These strategies would then form the basis for mitigation of long-term impacts of the Master Plan.

R-2-14

Summary


As outlined above, the EIR should identify and commit to specific mitigation measures for the impacts of its planned expansion through a combination of public transit system, highway system, and regional arterial system improvements, based on a comprehensive and multimodal approach to mitigating transportation impacts. In particular, mitigation measures as well as associated costs for Phase I (near term project-specific) impacts need to be identified in order for this document to serve adequately as a project-level EIR for Phase I improvements. Based upon our meeting with you last Friday, August 3rd, we understand that SDSU representatives will be scheduling a meeting with SANDAG in the near future to identify specific Phase I mitigation measures and associated costs in time to meet an internal deadline of August 20, 2007, to complete these estimates.

R-2-15

Thank you for your consideration of these comments. We look forward to working closely with SDSU to ensure that future growth at the University contributes not only to the region's intellectual growth, but also to the quality of life in the surrounding community and the region as a whole.

R-2-15
Cont.

Sincerely,



ROBERT A. LEITER, AICP
Director of Land Use and Transportation Planning

JSI/MK/sgr

cc: Lauren Cooper, Associate Director, Department of Facilities Design, Planning & Construction, SDSU
James Madaffer, Councilmember, City Council, City of San Diego
William Anderson, Director, City Planning and Community Investment, City of San Diego
Marcela Escobar-Eck, Director, Development Services Department, City of San Diego
Bill Figge, Deputy District Director of Planning, Caltrans District 11
Conan Cheung, Director of Planning & Performance Monitoring, Metropolitan Transit System
Gary Gallegos, Executive Director, SANDAG



JIM MADAFFER

COUNCILMEMBER
SEVENTH DISTRICT

July 27, 2007

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RECEIVED
JUL 27 2007
Facilities Planning, Design
and Construction

Dear Mr. Fulton:

I have reviewed the San Diego State University (SDSU) Master Plan Environmental Impact Report (EIR) Update and have grave concerns that there are areas in which an insufficient commitment has been made and incorrect data has been submitted.

L-1-1

In addition, I have received feed back from community groups and individuals from the College and Navajo communities sharing my concerns.

The following is a brief listing of my primary concerns and recommendations for SDSU which are described in greater detail on the following pages:

- It is time for the CSU Board of Trustees to reverse their position of "No More Campuses". The projected growth in the southern portion of San Diego County is significant. For example, Chula Vista alone has a projected growth of 52% by the year 2030 (Table 3.12-1). A campus in South Bay deserves consideration.
- SDSU owes residents of the surrounding communities a guarantee that the State of California Legislature will fund the required fair share mitigation measures before construction begins on each project.
- SDSU's on-going housing demand and market study has not been released. When released it should provide significant insight into the current and long-range housing requirements for the university. Because it has not been released, I demand SDSU extend the comment period for the EIR until that data is available for review, comment and inclusion in your final EIR.
- SDSU must update the traffic counts for the residential streets relating to the two Adobe Falls Village projects. The traffic counts must accurately reflect the classification of Residential Low Density and how that will impact the development of the Upper and Lower Villages.

L-1-2

L-1-3

L-1-4

L-1-5

In summary, I insist that SDSU do what they are obligated and required to do: Provide their fair share of mitigation, student housing and infrastructure.

L-1-6

On-Campus Housing

Other colleges and universities plan for adequate housing for students. Why can't SDSU?

The changes SDSU has outlined for the campus - particularly adding nearly 3,000 on-campus beds - are needed today, not tomorrow. Adding only 3,000 beds over the next 10-15 years doesn't improve the student housing situation. The new on-campus beds will provide housing for some of the 10,000 full-time equivalent students (FTES) you are projecting but it does not address the shortage of housing that currently exists.

L-1-7

On page ES-4, you state ultimately there will be 2,976 new beds on campus. SDSU is projecting 10,000 new full-time students. There is currently a shortage of student housing on and near campus. We all know that the addition of 10,000 full-time students will actually generate approximately 11,385 (page 3.12-1) new students. **I urge SDSU to commit to a total of 5,000 new beds on campus to help accommodate current housing shortages and to absorb its fair share of the new 10,000 FTES projected on campus.**

Community Impact of 10,000 additional FTES

On page 1.0-25 it states "The 10,000 full-time equivalent students (FTES) increase will necessitate the hiring of approximately 691 additional faculty and 591 additional staff members over the years through 2024-2025". This increases the total number of additional people on campus up to 12,667 (page 3.12-1).

In reviewing the statistical data on the CSU website – http://www.calstate.edu/as/stat_reports/2006-2007/f06_01.htm, Table I, indicates for the fall semester of 2006, SDSU had 28,797 FTES with a total enrollment of 34,035. That is an increase of 6,238 individuals actually on campus above the reported number of 28,797 FTES. That is nearly a 19% differential between the listed FTES and total number of enrolled students. SDSU is projecting to grow by 10,000 FTES and the actual number of new students on campus will be 11,345. If we use the same percentage increase for SDSU's projected growth that will actually add approximately 1,900 students to the projected increase of 10,000 FTES. Please clarify this discrepancy in your projections.

L-1-8

Even with the positive impact of the Metropolitan Transit System (MTS) Trolley stop on campus, SDSU will have a major negative impact on traffic in and around the campus. The EIR provides no information regarding significant upgrades to alleviate the traffic congestion that currently exists, let alone traffic congestion generated by future growth.

L-1-9

In 1993, SDSU promised the City of San Diego that SDSU would take responsibility for necessary improvements to College Avenue, Alvarado Road and the I-8/College Avenue interchange through the process of redevelopment. Nothing has transpired. The continued congestion in these areas is directly attributable to SDSU and not to additional growth in the communities surrounding SDSU. **This is the university's responsibility.**

L-1-10

Alvarado Campus Expansion

The proposed expansion of the Alvarado Campus along Alvarado Road does not include provisions for major traffic improvements between College Avenue and 70th Street. It does indicate Alvarado Road would be expanded to include more traffic lanes but there is no reference to what will happen to the vehicles that are currently parked end to end from Reservoir Drive and 70th Street. **SDSU must specify where those cars will be parked.**

L-1-11

On page 1.0-44 it states "The Alvarado Campus project component consists of the multi-phase development of approximately 612,000 square feet of instructional and research space.....A 1,840-car, multi-story parking structure is also planned, which when combined with the 191 planned surface parking spaces, would accommodate 2,031 vehicles".

L-1-12

The facilities plus 2,031 parking spaces has the very real potential of creating a gridlock. This poses a direct impact to health and safety of many citizens because of the proximity to Alvarado Hospital and the need for emergency medical treatment.

Adobe Falls Development – Upper and Lower Villages

The development of the two Adobe Falls projects is not in keeping with the objective of the Navajo Community Plan: It clearly states "Maintain and enhance the quality of existing residences". **Explain how your proposal to add a minimum of approximately 175 units between the two villages maintains and/or enhances the quality of existing residences when you are obviously going to overwhelm the current traffic counts.**

L-1-13

The reduced number of units for the proposed Adobe Falls Road complex, consisting of the Upper and Lower Villages in Del Cerro reads well on the surface but SDSU's street designations as to the number of allowable vehicles on Adobe Falls Road, Mill Peak Road and Genoa Drive remain inaccurate as defined (page 3.14-19 & 20). It is my understanding that the City's Development Services Department is adamant that these streets are to be designated as residential low volume.

On the second page of Appendix C-1, under Balance of Community Roadways, you state"Low Volume Residential Street is 700 Average Daily Trips (ADT), Residential Local Street is 1,500 and a two-lane Sub-Collector is 2,200 ADT".

L-1-14

The Upper Village, now proposed at 48 units, would have increased traffic computed at 8-10 ADT's per unit. This would be a total ranging from 384 – 480 ADT's for this development. This complex could possibly squeak by and fit into the current traffic mix. But the Upper Village complex alone coupled with the traffic already generated by the 67 homes on Adobe Falls Road and Mill Peak Road will be at the limit for a residential low volume street.

Why is there no listing of current traffic counts for Adobe Falls Road?

There are 67 homes on Adobe Falls Road and Adobe Falls Place. Even if SDSU assume that there are only 6 ADT's per household, as opposed to the recognized figure of 10 ADT's per household, that computes to 402 ADT's. Now add the projected traffic counts for the 48 units of the Upper Village 384 ADT's, (48 x 8) and the total count of 784 exceeds the 700 ADT's of a residential low volume street.

L-1-15

The true traffic counts must be listed in your EIR for all the streets that will be severely impacted by the Upper and Lower Village complexes SDSU is proposing to build.

With these traffic figures in mind, the construction of any units in the proposed Lower Village without an additional ingress/egress to the complex is unacceptable. In reviewing your cost projections for an alternative road, it is evident that a new ingress/egress is cost prohibitive.

L-1-16

For \$13,000 per unit you could generate a connection to the internal road structure with the Smoke Tree Condominiums but their roads are not designed for increased traffic and they continue to state they will not allow SDSU access to their private roads (Adobe Falls Alternative Access Cost Impact Summary pg 5.0-48).

A shuttle service from the proposed complexes to SDSU to alleviate traffic is appreciated but reducing the traffic projections by only 10% does not make a significant difference in the ADT's to justify your projected number of units.

L-1-17

One computation completely left out of the traffic figures is any type of projection for visitors to the trails you are planning to construct through the nearly 20 acres of land that will not be developed on SDSI property. **SDSU is negligent for failing to include these figures and must be provided.**

In presentations to community groups, SDSU has stated trails will allow access to the actual Adobe Falls. I applaud this since those who enjoy walking through the natural environment will enjoy the trails and Adobe Falls which is an historic landmark. Residents are accustomed to hiking in Mission Trails Regional Park and around Lake Murray. Adding additional trails within our community will draw many people on a daily basis, thus generating even more traffic than SDSU is projecting. These traffic figures need to be added to your projections.

L-1-18

Once traffic leaves the initial location of Mill Peak Road and or Adobe Falls Road they will ultimately end up at Del Cerro Boulevard and College Avenue. During peak morning traffic, this intersection is already at an "E" level of service (LOS). An "E" LOS is already an unacceptable traffic level for the community. Combine this with the fact that Phoebe Hearst Elementary School is located one block west of this intersection on Del Cerro Boulevard and you have a built in traffic safety problem. **Adding more traffic to this already overly congested intersection without some form of viable mitigation is unacceptable.**

L-1-19

I am deeply concerned with the destruction of valuable natural habitat. Page 4.0-01 states "Development of this parcel would eliminate a portion of this natural area and the habitat and species currently onsite. Seventeen of the 33 acres are proposed for development."

L-1-20

Air quality is another factor. Page 5.0-5 states "Long-term operations emissions from project-related traffic and consumer products use will exceed suggested thresholds. Because there are no feasible mitigation measures to reduce long-term air quality impacts to a level below significant, these impacts are significant and unavoidable". At the July 12, 2007 Del Cerro Action Council meeting, you indicated that the air quality standards referenced in your EIR were based on the region and not from samples taken at the site. Because of the volume of traffic from I-8 we can assume the air quality level on your property would be considerably higher than the norm for the region.

L-1-21

I have read the **Critical Analysis of Biological Elements of SDSU Environmental Impact Report** commissioned by the Del Cerro Action Council. It points out prominent deficiencies. This report from Everett and Associates Environmental Consultants indicates the biological elements of the EIR they believe are inadequate and require significant re-analysis in order to fully identify and discuss California Environmental Quality Act and other regulator issues. A copy of this report will accompany the letter from the Del Cerro Action Council.

L-1-22

There are a number of references in your document indicating that SDSU's Fair Share Percentage for mitigation ranges from 1 to 39%. The required mitigation for virtually all projects is due to expansion of SDSU. **SDSU needs to explain how its fair share can remain so low.** Nowhere is SDSU agreeing to pay for the majority of required mitigation. SDSU is creating the problems through its expansion and the lion's share of the mitigation is your responsibility.

L-1-23

We realize SDSU is going to grow and there are many hurdles facing the university and the surrounding communities. **I urge you to continue exploring the feasibility of trading your Adobe Falls property for property adjacent to the Grantville Trolley Station.** I am confident developers will be more than willing to work with SDSU in creating a complex by the trolley. It will help meet the faculty and staff housing requirements and will considerably reduce traffic within the Del Cerro community as well as into the College Area and on to SDSU's campus. Please note that the Caster Family Enterprises has just listed their property on the market for the purpose of redevelopment. They are the largest land holder east of Mission Gorge Road between Alvarado Canyon Road and Mission Gorge Place.

L-1-24

In closure, I want to emphasize in the strongest terms possible that SDSU must show some leadership, do the responsible thing and provide their fair share of mitigation, student housing and infrastructure.

L-1-25

Sincerely,



Jim Madaffer
Councilmember

JM/jw

MARIANNE GREENE
DEPUTY CITY ATTORNEY

OFFICE OF
THE CITY ATTORNEY
CITY OF SAN DIEGO

MICHAEL J. AGUIRRE
CITY ATTORNEY

CIVIL DIVISION
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TELEPHONE (619) 533-5800
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July 27, 2007

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RECEIVED

JUL 30 2007

Facilities Planning, Design
and Construction

Dear Mr. Fulton:

*Response to Draft EIR, June 2007, San Diego State University 2007 Campus
Master Plan Revision (State Clearinghouse No. 2007021020)*

The Office of the City Attorney, as the legal head of government for the City of San Diego, which is a Responsible Agency in the above-referenced matter, submits this comment letter on the June 2007 Draft EIR for the San Diego State University 2007 Campus Master Plan Revision [Draft EIR], pursuant to the California Environmental Quality Act [CEQA] § 21080.4.

L-2-1

The depth and breadth of the concerns previously raised by our office remain substantially the same as recited in our February 21, 2007 comment letter on the February 2007 Notice of Preparation of a Draft EIR/Initial Study. In short, numerous inadequacies plague the Draft EIR including but not limited to the following: adequately discussing proposed mitigation measures; providing sufficient data, and adequate mitigation, to support an analysis of impacts to population and housing; addressing feasible alternatives, such as alternative locations, and mass transit incentives, to lessen environmental impacts; and, analyzing cumulative impacts not only of the project components but of the project components combined and relative to each other.

L-2-2

However, with special regard to traffic and circulation, the traffic analysis in the Draft EIR is fatally flawed. This is detailed in the enclosed memorandum prepared by Labib Qasem, Senior Traffic Engineer, Development Services Department, City of San Diego. It is also

L-2-3

L-2-4

fatally flawed because it does not guarantee the implementation of the traffic mitigation measures it proposes. The Draft EIR at page 3.14-117 states, as follows:

“ . . . the university’s fair-share funding commitment is necessarily conditioned up[on] requesting and obtaining funds from the California Legislature. If the Legislature does not provide funding, or if funding is significantly delayed, all identified significant impacts would remain significant and unavoidable.” (emphasis added)

This approach relies on a faulty interpretation of *City of Marina v. Board of Trustees of the California State University*, 39 Cal.4th 341 (2006). There, the Board of Trustees [Trustees] rejected entering into a voluntary fair share agreement to mitigate traffic impacts with another agency that unlike itself had jurisdiction and authority to make infrastructure improvements. *Id.* at 351. The Trustees found that such an arrangement was legally infeasible pursuant to CEQA Guidelines § 21081(a)(2). *Id.* at 354. The California Supreme Court [Court] unanimously held, in relevant part, that, while the Trustees lacked jurisdiction and authority to build or expand extraterritorial roads to mitigate traffic impacts, the Trustees had authority to make fair-share contributions to a third party to construct the necessary infrastructure improvements, and therefore could not disclaim responsibility to mitigate environmental effects as infeasible pursuant to CEQA § 21081(a)(2). *Id.* at 366-367.

L-2-4
Cont.

“ If the Trustees can not adequately mitigate or avoid . . . off-campus environmental effects by performing acts on the campus, then to pay a third party . . . to perform the necessary acts off campus may well represent a feasible alternative.” *Id.* at 367.

The majority in the *Marina* court relies solely on interpreting CEQA. First, the Court states, “[a] finding by a lead agency under [CEQA § 21081(a)(2)], disclaiming the responsibility to mitigate environmental effects is permissible only where the other agency said to have responsibility has *exclusive* responsibility....As the CEQA Guidelines explain, “[t]he finding in subsection (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives.” (CEQA Guidelines, §15091, subd. (c).)” *Id.* at 366. Second, the Court states, while CEQA § 21004 does not give the Trustees direct or implied power to construct infrastructure on the land of others, neither does it “ . . . limit a public agency’s obligation to mitigate or avoid significant environmental effects to effects occurring on the agency’s own property . . . ,” citing to CEQA §§ 21002.1(b) and 21060.5. *Id.* at 367. Third, the Court states, CEQA § 21106 obligates the Trustees to make budget requests to the State Legislature to fund environmental mitigation. *Id.* at 367-368.

Beyond the holding, however, the *Marina* Court discusses that in discharging their duty under CEQA § 21106, if the Legislature does not grant a budget request for mitigation, then the Trustees' power in essence dissipates.

" [A] state agency's power to mitigate its project's effects through the voluntary mitigation payments is ultimately subject to legislative control; if the Legislature does not appropriate the money, the power does not exist [F]or the Trustees to disclaim responsibility for making such payments before they have complied with their statutory obligation to ask the Legislature for the necessary funds is premature, at the very least [T]he Trustees acknowledge they did not budget for payments . . ." *Id.* at 367.

This discussion is pure dictum. The holding was on the legality of disclaiming the responsibility to mitigate not on the implication of being unable to secure funds to mitigate. The Draft EIR improperly relies on this dictum to build towards an untenable either-or finding, that either they will -- or they will not -- mitigate significant traffic impacts.

In a concurring opinion, Justice J. Chin, strenuously objects to the majority dictum. First, the majority allows the Trustees to too narrowly frame the question, and that the real issue in applying CEQA § 21081(a)(2) is, " . . . whether they have any responsibility and jurisdiction to help fund . . . construction of those improvements . . ." *Id.* at 370. Numerous sections of the Education Code, particularly §§ 66606 and 89750, make it the Trustees' responsibility, as a matter of public interest, to make it a major priority, " . . . to plan that adequate spaces are available to accommodate all California resident students . . . ," and it grants the Trustees, " . . . full power and responsibility in the construction and development of any state university campus, and any buildings or other facilities or improvements connected with [CSU] . . . ," and finally, it commands the Trustees to, " . . . expend all money appropriated for the support and maintenance for the [CSU]." *Id.* at 371.

Justice Chin has " . . . no trouble concluding the Trustees have both the responsibility and jurisdiction within the meaning of [CEQA] § 21081(a)(2), to contribute to the cost of off-site infrastructure . . ." *Id.* Furthermore, even if the State Legislature denies funding requests for mitigation, the Trustees still have power and authority to contribute general operating funds towards their fair share of mitigation, thus undermining the Trustees' argument under CEQA 21081(a)(2) that such mitigation is legally infeasible if the State Legislature fails to grant the Trustees' budget request. *Id.* at 372.

The Draft EIR fails because the Trustees disingenuously attempt to dodge true responsibility by relying on dicta in the same California Supreme Court case that caused the collapse of the first Draft EIR on the San Diego State University Master Plan.

L-2-4
Cont.

Mr. Fulton, Director
Department of Facilities
Design, Planning &
Construction

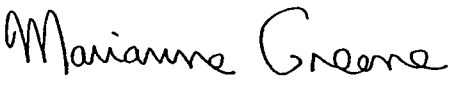
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July 27, 2007

Please be advised that the Office of the City Attorney may, upon further review, submit additional comments to ensure that the interests in protecting the City of San Diego from the numerous potentially significant impacts arising from the proposed project are adequately addressed in full compliance with CEQA § 21000 et. seq.

L-2-5

MICHAEL J. AGUIRRE, City Attorney

By 
Marianne Greene

MG:mg

Enclosure: Memorandum from Labib Qasem, Senior Traffic Engineer, Development Services Department, City of San Diego, to Mark Cass, Environmental Analysis Section, Development Services Department, City of San Diego, (July 26, 2007).

cc: Jerry Sanders, Honorable Mayor, City of San Diego
Scott Peters, Council President, City Council, City of San Diego
Tony Young, Council President Pro Tem, City Council, City of San Diego
Toni Atkins, Councilmember, City Council, City of San Diego
Kevin Faulconer, Councilmember, City Council, City of San Diego
Donna Frye, Councilmember, City Council, City of San Diego
James Maddaffer, Councilmember, City Council, City of San Diego
Brian Maienschein, Councilmember, City Council, City of San Diego
Marcela Escobar-Ek, Director, Development Services, City of San Diego

**CITY OF SAN DIEGO
M E M O R A N D U M**

DATE: July 26, 2007

TO: Mark Cass, Environmental Analysis Section

FROM: Labib Qasem, Senior Traffic Engineer,
Transportation Development Section

SUBJECT: Comments on the Draft EIR for the SDSU 2007 Campus Master Plan
Revision, Traffic Impact Analysis

We have reviewed the Traffic Impact Analysis dated June 1, 2007 completed by Linscott, Law & Greenspan Engineer and offer the following comments:

1. The Traffic Impact Analysis is based upon an unreasonably low trip generation for the proposed project, this understates the projects traffic impacts, required transportation mitigation measures and invalidates the Traffic Impact Analysis.

L-2-6

2. The current proposed project mixes in some of the proposed Paseo project, but not the entire Redevelopment Project. The project should be defined as including the entire Paseo project, with mitigation of traffic impacts shared between the two segments of the project.

L-2-7

3. Section 3.5 discusses the residential roadway capacity of local streets. Adobe Falls Rd/Mill Peak Road, Arno Drive, Capri Drive, Genoa Drive, Lambda Drive and Rockhurst Drive are all low volume residential local streets with an assumed capacity of 700 average daily traffic. The report should use 700 as the capacity of these streets.

L-2-8

4. Using the information presented in the Traffic Impact Analysis, there are six intersections, five street segments and four freeway segments currently experiencing poor or failing levels of service. This fact high lights the need for traffic mitigation of any increase in traffic from the proposed project.

L-2-9

5. Section 5.3, Existing Ramp Meter Operations, must include an analysis of the observed meter rates and the observed queue lengths.

L-2-10

6. Section 7.1.2 includes the proposed Paseo as a Horizon Year Cumulative Project. Because a part of the proposed Paseo is included in this Project at the same site and would be expected to have traffic impacts the same locations, please include the entire proposed Paseo project as part of this proposed project.

L-2-11

- | | |
|--|--------|
| 7. Section 8.1.1.A Starts with a reduced student trip generation rate used in the approved College Community Redevelopment Plan EIR, then further reduces the trip generation rate. The previously approved reduced rate is 3.1 trips per unit for student housing and 4.4 trips for unit for student housing should be used for this project. | L-2-12 |
| 8. On Pages 32 and 33, the Traffic Impact Analysis takes the existing SDSU traffic and assumes that the existing traffic will be reduced in the future due to a shift in mode to transit. The Trolley and transit center have been in place for several years, and their usage is reflected in the existing counts. The assumption that further reductions are appropriate in the future can not be supported and is unacceptable. | L-2-13 |
| 9. Figure 8-4 shows increases of traffic up to 250% in low volumes residential local streets within the Del Cerro Community to serve the proposed Adobe Falls development. These increases of traffic volume on the low volumes residential local streets are unacceptable. | L-2-14 |
| 10. Figure 8-5 shows that 60% of all trips from the proposed Adobe Falls development are to or from SDSU. This shows that this development should be located within the existing SDSU campus site to eliminate the traffic impacts of these trips on the already congested street system around the SDSU campus. | L-2-15 |
| 11. Section 9.1 examines a "Existing + Project" scenario. That scenario is not required. What is required to be examined is Existing, Existing + Other Pending Projects, Existing + Other Pending Projects + Project, Buildout and Buildout + Project. Please review the City of San Diego Traffic Impact Study Manual dated July 1998 and the Santec/ITE Guidelines for Traffic Impact Studies in the San Diego Region dated March 2, 2000. | L-2-16 |
| 12. Page 65 identifies that queue lengths exceed the available storage on the NB College Avenue to EB I-8 ramps. This will require mitigation by this project. | L-2-17 |
| 13. Section 14.1.1 proposes to take access through the existing SmokeTree development via their private driveways. This is unacceptable due to the traffic impacts. | L-2-18 |
| 14. Section 15.0 discusses the College Community Redevelopment Project. The earlier comments suggest that the entire project be defined as including the 1993 development, with traffic impacts identified and mitigation measures of those impacts proposed. Please review the Final Program EIR dated July 1993 for details of the traffic mitigations to be constructed by this proposed project. | L-2-19 |
| 15. Section 16.2 identifies a "fair share" contribution towards mitigation of impacts. All project traffic impacts must be mitigated as a part of this project. Simply stated, there are no other near term projects proposed to contribute towards these mitigation measures with the exception of the remaining Paseo project. | L-2-20 |

July 26, 2007

16. Page 91 discusses traffic calming for the proposed Adobe Falls residential development site. The relocation of this development onto the existing SDSU campus will alleviate this need.

L-2-21

17. Pages 92 and 93, Tables 16-1 and 16-2 are inaccurate due to the understatement of proposed project trip generation and the need to fully mitigate the project traffic impacts.

L-2-22

18. Page 98, Table A-3: The level of service at College Ave and Del Cerro Blvd is "F" with the proposed project mitigation. The proposed Adobe Falls residential development can not be accommodated with the planned roadway network.

L-2-23

19. The proposed project should mitigate all significant traffic impacts to the roadways and intersections by constructing the needed improvement. The proposed fair share contributions are unacceptable.

L-2-24

20. All proposed mitigation should be presented to the affected agencies for concurrence of the proposed mitigation. These mitigation meetings are often time consuming and involve engineering plans and cost estimates.

L-2-25

Should you have any questions or need additional information, please contact me at (619) 446-5358 or Jim Lundquist at (619) 446-5361.

Labib Qasem
Senior Traffic Engineer

C:\jim's work\07-07-26 SDSU Master Plan.doc



L-3

THE CITY OF SAN DIEGO

07/27/2007

Ms. Lauren Cooper
Associates Director
Facilities Planning, Design, and Construction
San Diego State University
5500 Campanile Drive
San Diego, Ca 92182-1624

RECEIVED

AUG 3 2007

Facilities Planning, Design
and Construction

Subject: City of San Diego Comments on the Draft Environmental Impact Report/Environmental Impact Statement for the proposed San Diego State University 2007 Campus Master Plan Revision.

Dear Ms. Cooper :

Development Services Department, Land Development Review offers the following comment on the Draft Environmental Impact Report/Environmental Impact Statement for the proposed San Diego State University 2007 Campus Master Plan Revision:

Environmental Analysis Section-Terri Bumgardner (619 446-5381)

The Development Services Department, Environmental Analysis Section has reviewed the Draft Environmental Impact Report/Environmental Impact Statement for the proposed San Diego State University 2007 Campus Master Plan Revision and provides the following comments.

L-3-1

Project Description

In regards to the project description of the existing environment of the Adobe Falls/North Campus site, more detailed information could be provided to address the contiguous resources to the project site. Additional analysis may be needed to address offsite direct and indirect impacts.

Visual Character:

The proposed Adobe Falls/North Campus site of the master plan would permanently change existing open space containing native habitat to urban development. This would

L-3-2



Development Services

1222 First Avenue, MS 501 • San Diego, CA 92101-4155

Tel (619) 444-5460

result in a significant direct and cumulative impact to visual character that would not be fully mitigated to below a level of significance.

L-3-2
Cont.

Potential Proposed Impact Areas:

Access to the project site will be provided through the construction of new road segments that connect Adobe Falls Road to Adobe Falls Faculty/Staff Housing site. All environmental impacts need to be disclosed including any street and utility impacts that would impact open space or wetlands which would require additional permitting by federal and state resource agencies (ACOE, CDFG, RWQCB, and USF&W). The potential impact of installing public utilities to serve the project should also be assessed in terms of impacts and mitigation. For instance if the sewer lateral for the project site must be installed through open space to connect to a trunk sewer, then potential impacts and mitigation must be included in the report analysis.

L-3-3

Due to the proximity of open space zones to the site, mitigation for other indirect impacts (modeled after the MSCP Land Use Adjacency Guidelines) should also be included to protect the adjacent area from human, animal intrusion, invasive species and contaminated run-off, etc. Indicate on the plans if brush management zone 2 must be accomplished off-site through adjacent owners such as within the City of San Diego's Open Space. If the owner is the City of San Diego, then a ROE will be required.

Due to the potential for impacts to sensitive habitats from runoff, a hydrology study should be provided analyzing both direct and indirect impacts. And in addition to the preservation of the wetlands on site, more analysis needs to be provided on the functions and values of the necessary biological buffers. A 25 foot buffer may not be adequate in providing the functions and values necessary to protect the wetland.

Wetlands Restoration Plan:

A conceptual wetland restoration plan should be provided with the draft EIR to provide a feasible solution to mitigate wetland impacts that may occur with the proposed projects of the *San Diego State University 2007 Campus Master Plan Revision*.

L-3-4

Public Utilities and Service Systems, Water Demand/Supply and Systems:

In accordance with Senate Bill 610 effective January 1, 2002, a project which is subject to CEQA, with residential development exceeding 500 dwelling units, and commercial office building having over 250,000 square feet, may be required to have a SB610 Water Assessment prepared by the water supplier. This process essentially requires proof that there will be adequate water supplies for larger project within a twenty-year time frame at the local level. The water assessment would address whether a projected water supply for the next 20 years, based on normal, single dry, and multiple dry years, will meet the

L-3-5

demand of the project. The conclusions of the water assessment would be included in the water supply impact analysis of the EIR.

L-3-5
Cont.

MSCP –Betsy Miller (619- 533-4543)

The biology report and the biological section of the EIR appear to be providing mitigation at Tier levels that appear to be in conformance with the City of San Diego Biological Guidelines and the City of San Diego's MSCP, although some mitigation ratios could be higher. Please clarify if the applicant, SDSU is interested in requesting Third Party Beneficiary Status from the City of San Diego and would like to request processing a Site Development Permit through the Development Services Department.

L-3-6

Traffic Analysis, Jim Lundquist (619-446-5361)

We have reviewed the Traffic Impact Analysis dated June 1, 2007 completed by Linscott, Law & Greenspan Engineer and offer the following comments:

L-3-7

1. The Traffic Impact Analysis is based upon an unreasonably low trip generation. For the proposed project, this understates the project's traffic impacts, required transportation mitigation measures and invalidates the Traffic Impact Analysis.
2. The current proposed project mixes in some of the proposed Paseo project, but not the entire Redevelopment Project. The project should be defined as including the entire Paseo project, with mitigation of traffic impacts shared between the two segments of the project.
3. Section 3.5 discusses the residential roadway capacity of local streets. Adobe Falls Rd/Mill Peak Road, Arno Drive, Capri Drive, Genoa Drive, Lambda Drive and Rockhurst Drive are all low volume residential local streets with an assumed capacity of 700 average daily traffic. The report should use 700 as the capacity of these streets.
4. Using the information presented in the Traffic Impact Analysis, there are six intersections, five street segments and four freeway segments currently experiencing poor or failing levels of service. This fact highlights the need for traffic mitigation of any increase in traffic from the proposed project.
5. Section 5.3, Existing Ramp Meter Operations, must include an analysis of the observed meter rates and the observed queue lengths.
6. Section 7.1.2 includes the proposed Paseo as a Horizon Year Cumulative Project. Because a part of the proposed Paseo is included in this Project at the same site and would be expected to have traffic impacts at the same locations, please include the entire proposed Paseo project as part of this proposed project.
7. Section 8.1.1.A Starts with a reduced student trip generation rate used in the approved College Community Redevelopment Plan EIR, then further reduces the trip

L-3-8

L-3-9

L-3-10

L-3-11

L-3-12

L-3-13

generation rate. The previously approved reduced rate is 3.1 trips per unit for student housing and 4.4 trips for unit for student housing should be used for this project.

L-3-13
Cont.

8. On Pages 32 and 33, the Traffic Impact Analysis takes the existing SDSU traffic and assumes that the existing traffic will be reduced in the future due to a shift in mode to transit. The Trolley and transit center have been in place for several years, and their usage is reflected in the existing counts. The assumption that further reductions are appropriate in the future can not be supported and is unacceptable.

L-3-14

9. Figure 8-4 shows increases of traffic up to 250% in low volumes residential local streets within the Del Cerro Community to serve the proposed Adobe Falls development. These increases of traffic volume on the low volumes residential local streets are unacceptable.

L-3-15

10. Figure 8-5 shows that 60% of all trips from the proposed Adobe Falls development are to or from SDSU. This shows that this development should be located within the existing SDSU campus site to eliminate the traffic impacts of these trips on the already congested street system around the SDSU campus.

L-3-16

11. Section 9.1 examines an "Existing + Project" scenario. That scenario is not required. What are required to be examined are Existing, Existing + Other Pending Projects, Existing + Other Pending Projects + Project, Build out and Buildout + Project. Please review the City of San Diego Traffic Impact Study Manual dated July 1998 and the Santec/ITE Guidelines for Traffic Impact Studies in the San Diego Region dated March 2, 2000.

L-3-17

12. Page 65 identifies that queue lengths exceed the available storage on the NB College Avenue to EB I-8 ramps. This will require mitigation by this project.

L-3-18

13. Section 14.1.1 proposes to take access through the existing SmokeTree development via their private driveways. This is unacceptable due to the traffic impacts.

L-3-19

14. Section 15.0 discusses the College Community Redevelopment Project. The earlier comments suggest that the entire project be defined as including the 1993 development, with traffic impacts identified and mitigation measures of those impacts proposed. Please review the Final Program EIR dated July 1993 for details of the traffic mitigations to be constructed by this proposed project.

L-3-20

15. Section 16.2 identifies a "fair share" contribution towards mitigation of impacts. All project traffic impacts must be mitigated as a part of this project. Simply stated, there are no other near term projects proposed to contribute towards these mitigation measures with the exception of the remaining Paseo project.

L-3-21

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L-3-23

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L-3-24

19. The proposed project should mitigate all significant traffic impacts to the roadways and intersections by constructing the needed improvement. The proposed fair share contributions are unacceptable.

L-3-25

20. All proposed mitigation should be presented to the affected agencies for concurrence of the proposed mitigation. These mitigation meetings are often time consuming and involve engineering plans and cost estimates

L-3-26

Should you have any questions or need additional information, please contact at Labib Qasem (619) 446-5358 or Jim Lundquist at (619) 446-5361.

Environmental Services Division, Donna Chralowicz (858 492-5059)

In 1989, the State Legislature passed an unfunded mandate called the Integrated Waste Management Act. This law requires local governments to reduce the amount of waste disposed of by any source within their borders by 50%. That means commercial sources, residential sources, government sources – any waste that is generated within the City of San Diego's boundaries is "counted" by the State and must be reduced.

Local governments have the means to regulate City government offices and also land uses within their jurisdictions, for example by requiring multifamily units and commercial buildings to provide appropriate areas for the storage of recycling bins. However, local governments have much less ability to control the actions of state agency facilities within their boundaries, even though the local governments are still responsible for waste planning and management of the off-site solid waste impacts of these government facilities. In other words, state facilities can have unregulated, significant impacts that thwart the efforts of local government to comply with state-imposed public service mandates.

L-3-27

Local governments are also required under state law to provide 15 years of disposal capacity. Thus local governments are responsible for both the reduction in waste through means such as source reduction, composting, and recycling, and also for ensuring there is adequate disposal capacity. The County of San Diego took the lead in preparing the guiding planning document for solid waste disposal facility planning, and this document (the Countywide Siting Element) was unable to show that the region had the required 15 years of disposal capacity. Thus there is an existing strain on this public service system.

The proposed project would guide significant expansion of San Diego State University, increasing the campus population, adding housing, and inducing growth. The construction-related and on-going impacts of this large project would have significant impacts on the City's already strained waste reduction and disposal systems, yet on page 34 of 60 the Initial Study dismisses this potential impact with a "naked" (unexplained) "Less Than Significant Impact" check mark.

The SDSU 2007 Campus Master Plan should include planning that addresses the solid waste management approach taken by the campus. It should include appropriate studies to determine the existing level of impact, and to estimate the additional tons that would be generated by the proposed expansion. Appropriate measure to reduce these impacts by at least 50% should be included in an MMRP and in binding requirements in the Master Plan. A similarly serious approach should be taken to addressing and controlling the increasing demand for energy that would be associated with this project. The Environmental Services Department is available to assist with development of appropriate sections within the 2007 Campus Master Plan addressing these essential public service issues. Please contact Donna Chralowicz at 858 492-5059 for more information.

L-3-27
Cont.

Please contact the appropriate above-named individual(s) if you have any questions on the submitted comments. We ask that you please address this issue and please provide us with a copy of the draft.

L-3-28

Sincerely,



Robert J. Manis
Deputy Director
Land Development Review Division

cc: Terri Bumgardner, Senior Planner, Development Services Department-Traffic
Labib Qasem, Development Services Department-Traffic
Jim Lundquist, Development Services Department-Traffic
Betsy Miller, Planning, MSCP

CITY OF SAN DIEGO
M E M O R A N D U M

RECEIVED
AUG 6 2007
Facilities Planning, Design
and Construction

DATE: August 6, 2007

TO: Ms. Lauren Cooper, Associates Director, Facilities Planning, Design, and Construction, San Diego State University

FROM: Jeff Harkness, Park Designer, Park Planning, City Planning & Community Investment Department, MS 35

SUBJECT: Draft EIR for the SDSU 2007 Campus Master Plan Revision

Park Planning staff of City Planning and Community Investment has reviewed Draft EIR for the SDSU 2007 Campus Master Plan Revision. We appreciate the opportunity to review this document for City of San Diego Park and Recreation Department issues and are providing the following comments:

General Comments:

The City's Park Planning Section of City Planning & Community Investment has been working with SDSU staff to address the City's population-based park requirements of the SDSU 2007 Campus Master Plan. Before Park Planning staff can fully support the adequacy of the Draft EIR with respect to population-based park requirements, an evaluation of SDSU's current recreational facilities needs to be completed. We look forward to working with SDSU staff in setting up a site visit for this evaluation.

L-4-1

Specific Comments:

Page 3.8-23 Table 3.8-2 College Area Community Plan Consistency Analysis, Park and Recreation Goal

The second Goal/Objective's Analysis states: "The recent redevelopment and expansion of SDSU recreational facilities included in the Aztec Walk Campus Master Plan provides the increasing campus population with adequate recreational opportunities." Please refer to the General Comment. Park Planning can not support this statement until an existing facility evaluation has been done.

L-4-2

Page 3.8-25, Table 3.8-3, Navajo Community Plan Consistency Analysis

The 3rd goal/objectives discuss both park and recreation facilities (neighborhood and community parks) as well as open space and trails. The Consistency Statement addresses the open space and trails, but not the neighborhood and community parks. Please address the neighborhood and community park goal/objectives and how this project will address this.

L-4-3

Page 3.13-7 Parks and Recreation.

Revise the second to last sentence to read: "The Hearst Elementary School in the Navajo community, and the Hardy Elementary School in the College Area, also serves the local

L-4-4

community's needs for open space areas and active recreational facilities through existing joint-use agreements.

L-4-4
Cont.

Page 3.13-7 Parks and Recreation,
Revise the 6th sentence to read: "Neighborhood parks should consist of at least 5 acres when adjacent to a school that has a joint-use agreement with the City for recreational purposes, or 10 acres, if disjointed from not adjacent to a school, or adjacent to a school with no joint use.

L-4-5

Page 3.13-7 Parks and Recreation,
Revise the 8th sentence to read: "If a community park is located adjacent to a school, with a joint-use agreement with the City for recreational purposes, it should consist of at least 13 acres; if distant from not adjacent to a school, or adjacent to a school with no joint use it should consist of at least 20 acres.

L-4-6

Page 3.13-8, first paragraph
Please revise the second sentence to read: "As indicated in the current City of San Diego Progress Guide and General Plan and in the October 2006....."

L-4-7

Page 3.13-8, second paragraph
Revise the second paragraph to read: "The Navajo Community Plan has designated the SDSU Adobe Falls site as a community resource based park, and indicates that the City-owned 4-acre parcel (Adobe Falls Open Space Park) within the Adobe Falls area could allow for access to the SDSU-owned land. (Navajo Community Plan, 1982....). Currently, the Navajo community has a total population-based park deficiency of 17.38 useable park acres. Utilizing SANDAG projected person per household figures, in 2030, that deficit will be reduced to 1.71 useable park acres at full community development. The College Area Community Plan does not designate additional park facilities within the College Area., but it does acknowledge a general deficiency in park facilities given existing population numbers. However, currently the College Community has a total population-based park deficiency of 44.17 useable acres. Utilizing SANDAG projected person per household figures, in 2030 that deficit will increase to 64.20 useable park acres at full community development.

L-4-8

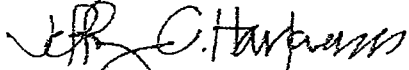
Page 3.13-24 Parks and Recreation, 1st paragraph
Please revise to read: "The proposed project would result in an increase in campus and surrounding area population by 3,849 residents over the next 20 years. Utilizing the General Plan standard of 2.8 acres per 1,000 residents, this would equate to the need for 10.37 useable acres of population-based parks, thereby potentially increasing the demand for park and recreation facilities or services. The additional students.....

L-4-9

Please refer to the General Comments on Park Planning's position regarding this paragraph of the EIR.

Draft EIR for the SDSU 2007 Campus Master Plan Revision
August 6, 2007
Page 3

Thank you.

A handwritten signature in black ink, appearing to read "Jeffrey C. Harkness". The signature is fluid and cursive, with the first name "Jeffrey" and last name "Harkness" clearly legible.

Jeffrey C. Harkness
Park Designer

JH/jch

cc: Deborah Sharpe, POII, Park Planning Section, CP&CI, MS 35

PTS TRACKING NUMBER:
 PROJECT TITLE: Alvarado Student Housing
 CYCLE:
 PROJECT MANAGER:
 COMMUNITY PLAN: College
 DUE DATE:

RESIDENTIAL UNITS	No. of Units	Density*	Population
	3000	1.00	3000

PARK ACRES	Population	GP Req.	Proj. Proposal	Acres Req.
	3,000	2.8/1000		8.40

PARK CONSTRUCTION	Acres	\$/acre	
Design and Construction	8.40	\$400,000	\$3,360,000
Land	8.40	\$2,000,000	\$16,800,000

	Population			Facility Cost	
Recreation Center	3000	\$25,000	0.120	\$5,950,000	\$714,000
Swimming Pool	3000	\$50,000	0.060	\$4,000,000	\$240,000

TOTAL \$21,114,000

* Density per SANDAG 2000 U.S. census data



San Diego County Archaeological Society, Inc.

Environmental Review Committee

5 July 2007

RECEIVED

JUL 6 2007
Facilities Planning, Design
and Construction

To: Ms. Lauren Cooper, Associate Director
Department of Facilities Planning, Design and Construction
Administration Building, Room 130
San Diego State University
5500 Campanile Drive
San Diego, California 92182-1624

Subject: Draft Environmental Impact Report
SDSU 2007 Campus Master Plan Revision

Dear Ms. Cooper:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its Appendix E, we have the following comments:

1. Disclosure of archaeological site locations is prohibited by state law. Appendix E, despite putting site record forms, record searches, NAHC sacred lands file search results, and confidential maps and photographs in separate confidential appendices, includes site locations repeatedly in its Section 6. Figures 6.0-1, 6.0-2 and 6.0-3 all show site locations. Additional figures in Section 6 also show details that possibly should have been restricted to avoid disclosing site locations. SDSU needs to obtain from the consultant a replacement version of Appendix E that is in full compliance with the disclosure restrictions and replace the version currently available on the SDSU website. It also must replace any and all hard copies of Appendix E that may be accessible to the general public, and ensure that the FEIR does not include such sensitive information. A copy of this letter is being provided to the South Coastal Information Center for their information. O-1-1
2. The small collection resulting from the testing conducted at sites SDI-18,326 and 18,327 should be curated at an institution meeting the standards of the State Historic Resource Commission's *Guidelines for the Curation of Archaeological Collections*, dated May 7, 1993. O-1-2
3. Section 8 of Appendix E states, on page 8.0-2, that "The preferred mitigation for identified indirect and cumulative impacts to the Adobe Falls Landmark and to the contributing Site SDI-17,221 is to repair and maintain the landmark." Mitigation measure CR-1 in the EIR only commits to having SDSU "work with the San Diego Historical Society to install appropriate fencing and signage in the vicinity of the area" O-1-3

designated as City of San Diego Historical Site Number 80, including the area designated as Site CA-SDI-17,221." To comply with the consultant's recommendation, Mitigation Measure CR-1 needs to be strengthened to require the "repair" described in the paragraph numbered 3 on page 8.0-2 of Appendix E, and to also commit SDSU to ongoing maintenance of the site.


O-1-3
Cont.

4. Finally, it needs to be kept in mind that the 50 year threshold for resources to be deemed historic is a rolling one. The use of 45 years as a threshold for evaluation helps account for the time between when impacts are analyzed and when they would occur by implementation of a specific project. As SDSU moves ahead with individual projects under this master plan, historical significance for those projects will need to be reassessed. Resources that were not considered significant under the current evaluation may become so, based on the different perspective the passage of time provides.

O-1-4

Thank you for including SDCAS in the public review period for this document.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Brian F. Smith and Associates
South Coastal Information Center
SDCAS President
File



College Area Community Council

P.O. Box 15723 • San Diego, CA 92175-5723

E-Mail: cacc@collegeneighborhoods.com • Web: www.cacc-sd.org

July 26, 2007

Anthony Fulton, Director
Facilities Planning, Design and Construction
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Dear Tony:

Attached are the comments to the Draft Environmental Impact Report for the SDSU 2007 Campus Master Plan Revision. We look forward to your responses in the Final EIR. It is our intent to take a position on the project and certification of the Final EIR at our September 12, 2007 Executive Board meeting, assuming that we are provided copies in sufficient time for adequate prior review.

We appreciate the modifications to the project made in response to previously expressed community input, in particular the substantial increase in the number of on-campus residence hall beds. A continuing major concern, however, is the significant impact the project will have for major intersections along College Avenue, Alvarado Road and Montezuma Road. As noted in Comments #25 and 34, unless funding from the Legislature for the California State University's "fair share" of mitigation measures for project impacts can be assured, we recommend scaling back the project.

O-2-1

We pledge to work with the University and the City of San Diego to lobby our local legislators to secure full "fair share" funding for all necessary mitigations required for all components of the plan ultimately approved by the CSU Board of Trustees.

Sincerely,

Doug Case
CACC President

cc: CACC Executive Board
Dr. Stephen L. Weber, President, San Diego State University
Jerry Sanders, Mayor, San Diego
Jim Madaffer, City Councilmember, District 7, San Diego State University
Christine Kehoe, State Senator, District 39
Shirley Horton, State Assemblymember, District 78

**College Area Community Council Comments to the
Draft Environmental Impact Report for the
SDSU 2007 Campus Master Plan Revision
Approved by CACC Executive Board, July 25, 2007**

Section 1.0 - Project Description

Comment 1: Explain how SDSU's proportion of the CSU enrollment increase was determined. Can other campuses with less enrollment and/or with greater access to land for development, including CSU- San Marcos, take a greater proportion of the increase?

O-2-2

Comment 2: Update the demographic statistics using the recently released SANDAG population growth statistics for San Diego County.

O-2-3

Comment 3: Identify the projected enrollment increase necessary if students from out of the county were to be capped at existing numbers and students from within the county were to increase proportional to SANDAG population growth estimates for the 18-24 age group.

O-2-4

Section 2.0 - Cumulative Impacts

Comment 4: Update Table 2.0-1. Confirm development plans for Mesa Commons I & II. Provide information on the Lindo Paseo Apartments, Montezuma South and El Cerrito Gateway since members of the CACC are unaware of those projects. Include proposed project changes for Centrepont. Clarify the status of the Sorority Row Housing Project and Aztec Inn at SDSU. (Will plans for Aztec Inn at SDSU remain if the Alvarado Hotel is built?) Include plans for new student apartments at the current Collwood Pines site.

O-2-5

Comment 5: Since SDSU and the SDSU Research Foundation own the majority of the land in "the former Paseo at SDSU" site, identify the University's and San Diego City Redevelopment Agency's plans for future redevelopment of the site.

O-2-6

Section 3.1 - Aesthetics and Visual Quality

Comment 6: Provide assurances that the architecture of the future buildings will conform to the Spanish /Mediterranean heritage of the past.

O-2-7

Section 3.8 - Land Use and Planning

Comment 7: The Consistency Statement in Table 3.8-3 "Navajo Community Plan Consistency Analysis" is inaccurate. For the first Goal/Objective, "Maintain and enhance the quality of existing residences..." the introduction of multifamily housing (Adobe Falls) in a single-family neighborhood is inconsistent this objective of the General Plan. Based on the project site's single-family zoning and General Plan designations, residents who live in this area of Del Cerro did not have a reasonable expectation that sharing their

O-2-8

streets with residents of a multi-family development was a possibility. The proposed housing is contrary to the area's single-family residential character.

O-2-8
Cont.

Comment 8: The DEIR states (3.8-26) that the introduction of multi-family housing (Adobe Falls) in a single-family neighborhood is not significant because SDSU is not subject to local regulation. This is incorrect. A significant impact experienced by a neighborhood does not disappear just because it is created or brought on by a State entity.

O-2-9

While it is true that SDSU, as a state agency, is not subject to the City's zoning regulations, it is subject to the CEQA process. CEQA is a mandatory process to disclose a project's scope, impacts, and mitigation. If impacts are not mitigatable, the discussion of whether or not the development should be implemented should be discussed under the EIR's Overriding Considerations, where the merits of the project are balanced against the impacts.

Comment 9: The DEIR states (3.8-26) that the Adobe Falls development is inconsistent with the "Park" designation of the Navajo Community Plan. A determination of an inconsistent land use is in normal circumstances a significant land use impact. The discussion of whether or not the development should be implemented should be discussed under the EIR's Overriding Considerations, where the merits of the project are balanced against the impacts.

O-2-10

Section 3.10 - Noise

Comment 10: The noise study done at Campanile Dr. and Montezuma Road was extrapolated to estimate the Collwood Blvd. to 55th St. segment. The two segments are topographically different such that the Collwood Blvd. to 55th St. segment would have higher volumes. The extrapolation needs to be revisited due to the topographical differences.

O-2-11

Section 3.12 - Population and Housing

Comment 11: The University needs an active and comprehensive marketing and public information program to assist students to find housing near bus and trolley routes and stops. Such a program would reduce the demand for housing in the immediate areas of the campus impacted by so-called "mini-dorms."

O-2-12

Comment 12: Table 3.12-3 "SANDAG Local Population Forecasts" indicates that the total percentage increase of population in the College Area between 2004 and 2030 is 48%. Clarify how this number was determined. It appears that much of 48% may have been based on the 40% FTES growth SDSU reported to SANDAG in 2005 as well as housing that was to be provided in the now stalled The Paseo project.

O-2-13

Comment 13: Provide data showing the number of students currently living in single-dwelling units and privately-owned and managed multi-family units in the College Area.

O-2-14

Comment 14: Table 3.12-10 "Projected Student Housing Units On or Nearby SDSU" includes 215 beds in the Sorority Row project and 1,300 beds in The Paseo project, both of which are indefinitely stalled and therefore should be deleted.

O-2-15

Comment 15: Justify the conclusion (3.12-23) that "... any potential impacts associated with an expanded student body resulting in the additional use of single-family homes in the surrounding community would be speculative and, in any event, less than significant." As long as living in single family housing is more economical, students will pursue this option in lieu of renting new and expensive apartments.

O-2-16

Comment 16: SDSU has commissioned a housing demand and market study, scheduled for release in Fall 2007 (3.12-15). The Public Comment period should be extended until the results of this study can be incorporated into the Draft Environmental Impact Report.

O-2-17

Comment 17: In the section regarding measures to control nuisance rental properties (3.12-21), it is incorrectly stated that City of San Diego Municipal Code Section 59.5.0502 regulates "music or crowds clearly audible 50 feet from a sensitive receptor's property line between the hours of 10:00 p.m. and 8:00 a.m." That code section only applies to amplified sound.

O-2-18

Comment 18: Include the proposed Rooming House Ordinance in the list of possible mitigation measures for nuisance rental properties (3.12-21).

O-2-19

Section 3.14 – Transportation/Circulation and Parking

Comment 19: No additional parking is proposed to be built to accommodate the approximately new 2,000 beds in the residence halls on the southeast corner of the campus. Presumably residents with cars in the new residence halls will park in Structures 3 and 6, displacing vehicle parking for commuter students who currently park in those lots. This will have a significant impact on parking and traffic circulation in surrounding neighborhoods and other areas of the campus; however, the DEIR fails to address this issue.

O-2-20

Comment 20: Consider as a parking and traffic mitigation measure prohibiting freshmen living on-campus from having cars, as many institutions currently do.

O-2-21

Comment 21: As a mitigation measure, consider providing for free trolley and bus passes to all students as other institutions in California do.

O-2-22

Comment 22: Parking destinations to encourage trolley ridership need to be identified such that commuters can park away from campus and then ride the trolley to campus.

O-2-23

Comment 23: Clarify plans for a shuttle service to bring students parking in outer parking lots/structures to the center of campus.

O-2-24

Comment 24: The Traffic Technical Report (3.14-20) assumes a static automobile/pedestrian circulation pattern. SDSU's automobile/pedestrian circulation is unlike other standard uses. The DEIR is unclear as to how many and what time the traffic study's traffic counts occurred in September 2006 and February 2007. It is also unclear (and not discussed) how pedestrians impact vehicular circulation. The impact of pedestrians on traffic flow is particularly significant on Montezuma Road and College Avenue adjacent to the campus. Analysis should include detailed discussion of these variations in the College Area's circulation patterns. Pedestrian circulation and its interaction with traffic patterns should be fully analyzed. Mitigation should include timely synchronization of traffic lights to improve automobile and pedestrian circulation.

O-2-25

Comment 25: Section 3.14.14, "Level of Significance After Mitigation," states that the project would result in significant and unavoidable impacts to "College Ave. / I-8 interchange, Montezuma Rd. (between Fairmount Ave. to Collwood Blvd.), Alvarado Rd. (between East Campus Drive to 70th St.), and I-8 (between Fairmount Ave. to Fletcher Parkway)." The project's ability to contribute its fair share to the impacts is dependent on funding from the State Legislature. If the Legislature is unable to adequately fund mitigation for project impacts, the affected parts of the projects should not be built until the associated mitigations are provided.

O-2-26

Comment 26: As part of a program to mitigate traffic/pedestrian circulation, the University needs an active and comprehensive marketing and public information program to encourage students and staff to carpool and to take other modes of transportation to minimize automobile trips.

O-2-27

Comment 27: Identify the specific intended mitigation measures to be taken to provide for the additional traffic on Alvarado Road that will be generated by the hotel, new academic buildings and parking structure, including the impacts on the Alvarado Road/College Avenue, Alvarado Road/70th Street and Alvarado Road/Reservoir Drive intersections.

O-2-28

Comment 28: Consider utilizing part of Parking Lot C to realign Alvarado Road near College Ave. and/or to redirect bike paths.

O-2-29

Comment 29: Increasing the number of lanes on Alvarado Road between Reservoir Drive and 70th Street would require the removal of on-street parking currently utilized to capacity by the multi-family developments along Alvarado Road. Viable mitigation measures need to be proposed for this significant impact.

O-2-30

Comment 30: The Draft EIR fails to address traffic increases (volume) on main feeder streets within the College Area (i.e. Saranac Street, Mohawk Street and El Cajon Blvd.).

O-2-31

Comment 31: The Fair Share Percentages for traffic improvements (Table 3.14-36) seem unrealistic. If an improvement is necessitated by the Master Plan Revision that would normally not be considered in the absence of the plan, the CSU should fund the majority

O-2-32

of the expense. The Fair Share Percentages only range from 1% to 39%, with only 5 of the 33 mitigation measures exceeding 20%.

O-2-32
Cont.

Section 5.0 – Alternatives

Comment 32: The University fails to give serious consideration to the development and/or expansion of off-campus centers because past efforts have not been cost-effective and because students who utilized the centers still made trips to the main campus to take other courses and use facilities such as the library, student union, etc. Certainly, the university can be more creative in the use of off-campus centers. For example, some centers can be designed specifically for graduate students in certain majors, joint programs can be instituted with community colleges, and student services can be provided at off-campus centers.

O-2-33

Comment 33: The analysis of Alternate Locations (Section 5.5) is inadequate and seems to be oriented toward reaffirming the University's site preferences. The cursory analysis (5.0-32) seems to be based primarily on financial cost to the university not environmental impacts.

O-2-34

Comment 34: Unless the State Legislature agrees to fully-fund the CSU's fair share of necessary mitigation measures, the "5,000 FTES Alternative" (5.0-2) should be selected.

O-2-35

Comment 35: The EIR should consider adjusting the University's admission policy to reduce the number of students from outside its service area to increase capacity for students within its service area.

O-2-36



Smoke Tree Adobe Falls Owners Association
5657 Adobe Falls Road San Diego, CA 92120

Lauren Cooper
Administration Building, Room 130
SDSU
5500 Campanile Dr.
San Diego, CA 92182

July 13, 2007

Dear President Weber and Committee Members:

The residents at Smoke Tree are appalled in your determination to build on the property adjacent to ours. When we bought here, the land was listed as a green belt and was to remain that way. It would seem to be more appropriate for SDSU to leave this historic area free for public use as a green space for people to enjoy and view the waterfalls. This is beautiful land that you will destroy in your persistence to build outside of the college area.

O-3-1

Smoke Tree understands that using our streets is the easiest and cheapest way for egress in and out of your property. We will never agree to this. Our streets are only twenty feet wide with our garage driveways on an average of nine feet which end directly on the street. We have no sidewalks and the fire department has designated our streets as fire lanes for emergency vehicles. It is difficult for two cars to pass at the same time.

If additional traffic is allowed and since we have no sidewalks, our residents will not be able to walk the property nor walk their pets without being in danger of being hit by vehicles. Mail delivery and trash pickup presents additional congestion. Our privacy will be destroyed and our quality of life hampered.

O-3-2

We have closed off the road on the east side of our property to discourage vehicular traffic through our streets which has been in effect for over the twelve years I have lived here. However, our gate is easily accessed by emergency vehicles and our residents in an emergency. We maintain two entrances/exits into and out of our property for safety reasons. In most cases, Smoke Tree residents have no interest in using the Del Cerro (east) side of Adobe Falls. Our streets are privately owned and we pay for paving and upkeep. We could not afford nor want to incur additional expense due to use by college residents. We also own the land on both sides and under the flood control channel. We would never agree to a road over this channel.

Please keep in mind that Smoke Tree will never agree to opening our roads to additional traffic. You will need to find another way. Right now, it would seem that you already have city streets in place and ready to go which would be your best alternative.

We would also like your assurance that the buildings in Adobe Falls will house only faculty and staff and not be converted to student housing in the future. Please include this in your EIR and covenants.

O-3-3

Sincerely,

Carolyn Colmie
Carolyn Colmie, President

RECEIVED

JUL 17 2007

Facilities Planning, Design
and Construction

Del Cerro Action Council

P.O. Box 600801 · San Diego, California · 92160 · dcac@cox.net

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July 27, 2007

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JUL 27 2007
Facilities Planning, Design
and Construction

Anthony Fulton, Director
Facilities Planning & Management
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RE: DCAC's Comments on/Objections to
Draft EIR for San Diego State University's
2007 Draft Masterplan

Dear Mr. Fulton:

The Del Cerro Action Council ("DCAC") is a non-profit, non-partisan, civic organization comprised of concerned citizens who live or work in the community of Del Cerro. The DCAC monitors and seeks solutions for issues affecting the Del Cerro area and is governed by a board of directors elected annually by its membership. On behalf of the DCAC and the Del Cerro community, I respectfully submit the following comments regarding the Draft Environmental Impact Report ("EIR") pertaining to San Diego State University's 2007 Draft Master Plan.

TRAFFIC AND SAFETY IMPACTS:

1. SDSU's analysis of traffic impacts to the residential streets of Del Cerro, namely, Del Cerro Blvd., Genoa, Arno, Capri, Mill Peak, and Adobe Falls Road is inadequate because it determines the impacts of the proposed Adobe Falls development using unsupported levels of service estimates, as opposed to percentage increases in average daily trips, as required by CEQA guidelines. (See, CEQA Guidelines, Append. G, subd. XV(a).) The Guidelines provide agencies should analyze traffic/circulation impacts in terms of whether a project will "[c]ause an increase which is *substantial in relation to the existing traffic load and capacity of the street system.*" (*Id.*)

The traffic increases caused by the proposed Adobe Falls development will, indeed be significant and adverse. Using the numbers provided in the EIR (EIR, Traffic and Circulation, Section 3.0, pp. 3.14-22; 3.14-37; 3.14-44, Figure 8-4), the percentage increases will be as follows:

O-4-1

O-4-2

Anthony Fulton
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Street Name	Existing Traffic	+Project	% Increase
a) Del Cerro Blvd:	5170	1240	24%
b) Capri	720	890	123%
c) Arno	370	890	241%
d) Genoa	400	480	120%
e) Lambda	600	70	12%
f) Rockhurst	500	70	14%
g) Adobe Falls Rd	410	1040	254%

O-4-2
 Cont.

Given these percentage increases, SDSU must acknowledge in its EIR, per CEQA Guidelines, these are significant adverse traffic impacts because they are most certainly *substantial in relation to the existing traffic volumes* — with some exceeding 100 and 200%. SDSU must also provide all necessary mitigation/avoidance analyses required by CEQA as to these streets. However, the EIR has already acknowledged there are little to no feasible mitigation measures for this traffic, i.e., in the form of a means of alternate access. Therefore, it appears the project will result in significant, unmitigated impacts which are avoidable by either eliminating the project, or significantly reducing its scope, i.e., by less than 50%. Given these factors, DCAC urges SDSU to avoid these significant impacts by either eliminating the project altogether or significantly reducing its scope.

2. It appears the EIR's analysis of traffic impacts to Adobe Falls Road is inadequate as the numbers provided within the EIR are inaccurate, internally inconsistent, require clarification or some combination of these. On page 3.14-37, the EIR indicates the traffic generated by the lower development will be 990 ADT. Primarily, this number must be corrected as $124 \text{ units} \times 8 \text{ ADT} = 992$, not 990. However, at p. 3.14-44, Figure 8-4 indicates the traffic load on Adobe Falls Road will increase by 1040 ADT. It's unclear how 1040 ADT are extrapolated from 992. Please clarify this number pertaining to the amount of traffic to be generated by the proposed lower development at Adobe Falls.

O-4-3

Next, at p. 3.14-27, Table 3.1427A indicates the total volume of traffic on Adobe Falls Road, following completion of the project will be 840 ADT. Given the existing 410 ADT, this 840 figure clearly does not reflect either the additional 992 or 1040 ADT SDSU indicates will be generated by the project. These figures require correction and further analysis consistent with CEQA Guidelines, as noted above.

O-4-4

3. The EIR acknowledges the intersection at Del Cerro Blvd and College Avenue, which is the only point of access for the proposed Adobe Falls development, is already operating at failing levels of service, i.e., a LOS of "E" in the peak morning hours and "D" in the peak afternoon/evening hours. (EIR, at p. 3.14-23.) Further, the additional traffic to be generated by the Adobe Falls project will further exacerbate the

O-4-5

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problems with that intersection by taking the LOS levels to "F" and a lower level "D" in the morning and afternoon peak hours, respectively. These are significant adverse impacts given the existing failing levels of service, and SDSU proposes that more turn lanes be put in to mitigate them. (EIR, Section 3.0, Traffic Circulation and Parking, Table 3.14-21; p.3.14-102.) However, there is no evidence provided and no further discussion on this topic. It's not clear that it would even be possible to construct such additional lanes, nor is there any evidence as to how exactly these turn lanes would purportedly mitigate the impacts, and how or why they would mitigate the impacts in any given amount. All portions of the intersection and the surrounding properties appear to be fully built out, with no apparent room for additional lanes. Nor is it clear the city has been consulted on this issue and/or would even be willing to participate in the construction related to this mitigation measure. This portion of the EIR is inadequate in that it fails to provide support for its proposal to mitigate the impacts to this intersection and must be re-written with the proper evidence and analysis provided. And to the extent the city is unwilling to participate in such mitigation, it must be disclosed as "unmitigable."

O-4-5
 Cont.

Further, SDSU fails to take into account the fact that, because the intersection is already operating beyond its capacity, it was clearly not designed and/or planned by the city to accommodate additional traffic.

Finally, SDSU indicates its fair share of any mitigation to this intersection is 5%. The EIR needs to disclose evidence to the effect this is an appropriate number given SDSU proposes an increase in traffic through part of the intersection of approximately 24%.

4. In SDSU's analysis of alternatives, there is a discussion of the "No Adobe Falls" alternative, as well as a "50% Adobe Falls Alternative". (EIR, Section 5.0, Alternatives, p. 5.0-2, *et seq.*) The EIR states under either of these alternatives, significant traffic impacts would not be avoided. (*Id.*, at pp. 5.0-16; 5.0-22.) This is inaccurate. The significant adverse traffic impacts to Del Cerro's residential streets and the significant impacts to the intersection at Del Cerro Blvd and College Avenue would both be avoided under these alternatives, either wholly or in part. The EIR must acknowledge the aforementioned impacts are both significant and avoidable.

O-4-6

5. SDSU takes the liberty of classifying Del Cerro's residential streets which have not been classified by the city of San Diego. SDSU conducted a "custom ultimately conclude they should be classified as residential local streets with a traffic capacity of 1500 ADT. (See, EIR, 3.14-11 – 3.14-12.) However, the most important characteristic of these streets which was omitted in this analysis is the *existing traffic volume on these streets*. The existing traffic volume on each of these streets is a characteristic which must be taken into consideration in SDSU's analysis and weighs

O-4-7

Anthony Fulton
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heavily in favor of a "Low Volume Residential Local Street" classification, with a maximum capacity of 700 ADT.

Further, as SDSU acknowledges, residential streets do not have levels of service. (See, EIR, at p. 3.14-12.) Nevertheless, the EIR estimates an LOS of "C" for these streets. (*Id.*, at pp. 3.14-12 – 3.14-13.) This is improper and unsupported by objective criteria, including the San Diego Roadway Classification Manual and LOS Table. The proper analysis is dictated by CEQA Guidelines which dictate traffic impacts must be assessed in terms of whether an increase in traffic is *substantial in relation to existing traffic volumes*, as noted above.

6. The EIR states the Adobe Falls will be partially restored with trails allowing for easier access. This is an historical site in San Diego, and its restoration will likely to generate additional public visitor traffic. Yet the EIR never accounts for the potential traffic generated by such an attraction. SDSU must disclose this amount of traffic generation, and any mitigation measures proposed.

7. The EIR acknowledges Del Cerro Blvd's maximum desirable capacity, per the Navajo Community Plan, is 5,000 ADT. It also acknowledges Del Cerro Blvd is currently operating past that capacity by 170 ADT. ANY amount of additional traffic on Del Cerro Blvd constitutes a significant adverse impact which must be mitigated or avoided, particularly because this is the only means of access/egress to the homes west of College Avenue, and because it adversely impacts the safety of residents and schoolchildren attending the schools at Phoebe Hearst and Temple Emanu-El.

8. The EIR never fully acknowledges the full amount of traffic to be generated by the project, but instead reduces the amount by 10%, claiming they intend to introduce a shuttle service which will reduce the project traffic by that amount. (See, i.e., EIR, at p. 3.14-59, Table 3.14-18.) Yet, SDSU never provides any evidentiary basis for this 10% number. This is improper. CEQA requires that an EIR be adequate as an informational document for the public in terms of the impacts a given project will generate. SDSU must fully disclose impacts first, then discuss mitigation. Consequently, SDSU must first disclose the full amount of the ADT, without any reduction for shuttle service. Then, evidence must be provided regarding the type of shuttle service intended for the project, the types of buses intended, proposed routes of service and the basis for any specified percentage of traffic the shuttle is intended to reduce.

O-4-7
Cont.

O-4-8

O-4-9

O-4-10

Anthony Fulton
Re: SDSU's 2007 Master Plan and EIR
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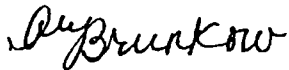
BIOLOGICAL IMPACTS.

Attached hereto is a copy of a letter from William T. Everett, certified biological consultant, as well as his statement of qualifications. The DCAC incorporates by reference here the entire content of Mr. Everett's letter as if it were set forth fully herein. The DCAC asks that SDSU respond specifically and in detail to each and every one of Mr. Everett's comments pertaining to the Biological Elements of 2007 EIR for SDSU's 2007 Master Plan, numbered 1 through 8.

O-4-11

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Anne Brunkow
President
Del Cerro Action Council

EVERETT AND ASSOCIATES
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25 July 2007

Anne Brunkow, President
Del Cerro Action Council
P.O. Box 600801
San Diego, California 92160

Re: Critical Analysis of Biological Elements of SDSU Environmental Impact Report

Dear Anne,

At your request I have reviewed the biological elements of the 2007 SDSU Master Plan Revision Environmental Impact Report, including Appendix D (Biological Resources Report) and Section 3.3 (Biological Resources), with specific attention to the Adobe Falls Faculty/Staff Housing Site. Specifically, I have focused on the adequacy of the biological work conducted in support of the EIR, the documentation of that work, and the interpretation of results and discussion presented in the EIR. This analysis was done in the context of assessing adequate compliance with the California Environmental Quality Act and other applicable state and federal regulations.

O-4-12

In general, I believe that the field work conducted was adequate and sufficient to accurately inventory and characterize the significant biological resources actually on the site, with the proviso that there appears to be little survey work focusing on migratory birds that would only be present during the winter. In addition, the scientific literature review conducted for the project failed to include the San Diego County Bird Atlas (Unitt, P. 2004. Proceedings of the San Diego Society of Natural History No. 39. 645 pp.), the most important regional ornithological publication in the last 100 years. This reference could contain information critical to the EIR.

The following is a summary of the biological elements of the EIR that I believe are inadequate and require significant re-analysis in order to fully identify and discuss CEQA and other regulatory issues:

1. The EIR does not adequately discuss additional regulatory requirements that the project must address and satisfy, including California Department of Fish and Game §1600 (Streambed Alteration Agreement) requirements, U. S. Army Corps of Engineers §404 of the Clean Water Act, CWA §401 Water Quality Certification, and the Endangered Species Act Habitat Loss Permitting requirements of the state and federal Wildlife Agencies. In particular, these jurisdictional entities do not allow "avoidable" impacts to wetlands, the most sensitive and valuable habitats in California. Clearly, the Adobe Falls element of the proposed project is "avoidable". This alternative is apparently not discussed.

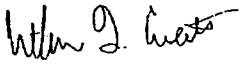
O-4-13

Del Cerro Action Council, Page two
25 July 2007

- | | |
|--|---------------|
| <p>2. If wetland impacts were somehow deemed to be allowable, the proposed mitigation ratio (~ 2:1) is woefully inadequate relative to long-standing policy and practice for all other lead agencies in the region. The EIR contains no discussion whatsoever of appropriate wetland impact mitigation ratios.</p> | <p>O-4-14</p> |
| <p>3. The biological elements of the EIR do not adequately describe, inventory, or address contiguous resources, including wetlands and potentially significant upland habitats and species. The reader is generally left with absolutely no indication or discussion of potential off-site impacts, direct or indirect, short term or long term.</p> | <p>O-4-15</p> |
| <p>4. The EIR proposes retaining 9.51 acres of habitat on the site as mitigation, but it does not discuss the long-term sustainability of the preserved habitat, especially in its proposed fragmented and reduced condition with the existing and resultant indirect short and long-term impacts. In all likelihood, the remaining fragmented habitat has little to no long-term viability or sustainability. All habitats on the site should be considered unavoidably impacted by the proposed project.</p> | <p>O-4-16</p> |
| <p>5. The EIR states that impacts to sensitive plant species are not significant and do not require mitigation. This is not consistent with long-standing policy and practice for other lead agencies in the region. Impacts to sensitive plant species should be mitigated at a minimum 2:1 ratio independent of and in addition to impacts to sensitive habitats. Discussion of thresholds of significance for impacts to sensitive plant species is inadequate and needs to be revisited. If <i>any</i> habitat on the site is deemed worthy of preservation, then impacts to <i>any</i> impacted sensitive species on the site should be appropriately mitigated.</p> | <p>O-4-17</p> |
| <p>6. The EIR mentions potential impacts to changes in hydrology resulting from the project, especially with reference to direct and indirect impacts from runoff to remaining and contiguous sensitive habitats. However, these potential impacts are not analyzed or adequately presented and discussed. With this site in particular, hydrology is a cornerstone element to the value of the resources that are present, adjacent, and proposed for preservation.</p> | <p>O-4-18</p> |
| <p>7. The proposed mitigation includes the acquisition of wetland habitat off-site. However, it is unlikely that such mitigation opportunities exist because virtually all local and state agencies have a "no net loss" policy regarding wetland impacts that obviates preservation for mitigation banking purposes. This is not addressed in the EIR.</p> | <p>O-4-19</p> |
| <p>8. Lastly, the proposed avoidance and preservation of wetland habitats on-site makes no mention of necessary biological buffers and contiguous limited building zones. It is a well-established policy of the Wildlife Agencies and most CEQA lead agencies that preservation of wetlands is highly dependent on providing an adequate and inviolate biological buffers of at least 100 feet. In order to protect the buffers, no structures requiring fire protection should be placed within 100 feet of the boundary of the biological buffers. The biological analysis of the EIR is critically deficient in discussion of impacts related to fuel abatement requirements. A Fuel Management Plan is critical to assessing actual and potential impacts to biological resources. No such discussion or analysis is presented.</p> | <p>O-4-20</p> |

Del Cerro Action Council, Page three
25 July 2007

If you have any questions at all, please call me at your convenience. Thank you for the opportunity to provide this analysis.



William T. Everett
Certified Biological Consultant

O-4-20
Cont.

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STATEMENT OF QUALIFICATIONS

William T. Everett is a research, consulting, and conservation biologist with more than 32 years experience in the San Diego environment and around the world. He has logged more than 12,000 hours of field work, all detailed with field notes. In the 1970's Bill apprenticed in the study of chaparral ecology under Frank Gander, the retired but renown premier California botanist of the 1930s and 40s. Although his specialty is ornithology, Bill has a long-standing interest in all endangered species management and conservation issues. As President then Conservation Chairman of the San Diego Chapter of the Audubon Society in the late 1970s, he gained a keen understanding of the conservation challenges facing a growing Southern California. He subsequently became one of the first Biological Consultants certified by the County of San Diego in the 1980s. Bill is a Fellow of the National Association of Environmental Professionals (NAEP) and subscribes to the NAEP Code of Ethics and Standards of Practice for Environmental Professionals.

Bill Everett has published numerous scientific articles and conducted research in Southern California, Alaska, Baja California, South America, and throughout the tropical Pacific Ocean. In 1977, in recognition of his accomplishments, he was appointed as a Research Associate of the Department of Birds and Mammals of the San Diego Natural History Museum, a position he holds to this day. In 1990 he was elected as a Research Fellow of the Zoological Society of San Diego, and in 1988 was appointed as the Senior Conservation Biologist of the Western Foundation of Vertebrate Zoology. The Royal Geographic Society of London elected Bill as a Fellow in 1996, following his election as a Fellow of the Explorers Club in 1990.

Hired as a biologist for the U.S. Fish and Wildlife Service in 1977, Bill conducted research on endangered Peregrine Falcons in Northern California at a time when their continued existence was questionable. His interest in threatened species led to publication by the Audubon Society in 1979 of his paper entitled "Threatened, Declining and Sensitive Bird Species in San Diego County" (Sketches 36:1-2). This paper contained the first published account of the decline of the California Gnatcatcher.

Beyond the Southern California area, Bill has prepared the seabird impacts sections for the Draft and Final Environmental Impact Statements for Hawaii-based Pelagic Fisheries of the Western Tropical Pacific Ocean (2001), received a National Science Foundation major grant to lead an International Biocomplexity Survey and Expedition to Isla Guadalupe, Baja California, Mexico (2000), led the effort to save North America's most endangered bird species, the San Clemente Loggerhead Shrike (1991-1997), and currently heads up efforts to restore bird populations on Wake Atoll and Christmas Island in the central Pacific.

Bill holds a U.S. Fish and Wildlife Master Bird Banding Permit (#22378) with Endangered Species Authorization, and California Gnatcatcher Survey Authorization Permit # TE-788036. He

received his Masters Degree from the University of San Diego in 1991, and completed a Post-Graduate Program at Harvard University's John F. Kennedy School of Government in 1997.

Bill has served as a member of the Conservation and Research Committee of the Zoological Society of San Diego since the committee was first established. In 1990, he founded the Endangered Species Recovery Council (www.esrc.org), an international organization of scientists and conservationists dedicated to finding solutions to the problem of species extinctions. He continues as President of the organization.

In May 2002 Bill was honored in New York as a first recipient of the Explorers Club "Champions of Wildlife" award.

ALVARADO HOSPITAL

July 27, 2007

Ms. Lauren Cooper
Associate Director
Department of Facilities Planning
Design and Construction
Administration Building, Room 130
San Diego State University
5500 Campanile Drive
San Diego, Ca 92182-1624

RECEIVED
JUL 27 2007
Facilities Planning, Design
and Construction

Subject: Comments Draft EIR for the SDSU 2007 Campus Master Plan Revision

Dear Ms. Cooper:

We are in receipt of the subject document and we are providing comments consistent with the guidelines set forth therein. As noted in our earlier correspondence regarding this project, we view San Diego State University (SDSU) as a key community resource and neighbor. We are supportive of the University's plans to expand to meet the demand for educational facilities and to pursue related research and complimentary activities as set forth in the 2007 Master Plan revision.

Over the past several months we have had very productive conversations with a variety of your faculty leaders exploring ways that we can mutually benefit from our respective strengths and location. We have enjoyed our meetings with Dean Newhoff, and Dr. Maloy and other SDSU team members and have identified several areas where we can create symbiotic strength. We are proud to be neighbors with the Number One Small Research University in the Nation. Congratulations on this tremendous achievement.

O-5-1

With specific regard to the Draft EIR, we continue to have concerns related to the traffic impacts of the planned development. We believe that the issues addressed in our earlier correspondence have not been sufficiently addressed. We are providing the following additional comments with regard to the Draft EIR.

1. Public Utilities and Services Systems - Item PSS-2 states that SDSU shall work with Alvarado Hospital and the City of San Diego following project approval to improve emergency access to the hospital. We believe that this mitigation measure is insufficient in two ways. First, this mitigation measure is timed to follow the project approval. While we understand SDSU's imperative to pursue this plan as soon as possible, it is important that mitigation measures are agreed to prior to project approval. Additionally, there is no mention as to mitigation of traffic congestion during the construction of this project. We believe that there

O-5-2

needs to be specific mitigation during the development and construction phase of this project in addition to mitigations to the impacts of the project itself to ensure continuous access to Alvarado Hospital's emergent medical services by emergency vehicles.

O-5-2
Cont.

2. Section 3.14 Transportation/Circulation and Parking – There are several mitigation measures identified in this section as well as comments identified as "Residual Impacts." Starting with the latter, we are very concerned that the statements in the "Residual Impact" section appears to us to indicate that the University intends to pursue the development of this project even if it is unable to obtain funding through the Legislature for its "fair share" of the improvements required to mitigate the project's impact. It is considered that the development of this project should not proceed without appropriate funding to mitigate the traffic impacts of this project. We stand ready to support the University in any action to seek funding from the Legislature, or other sources, to ensure that needed mitigations are funded appropriately. Secondly, there are several references to SDSU's "fair share" of the cost to provide mitigations for project impacts. While there may be a definition or discussion of "fair share" somewhere in the voluminous documents you have provided, it is as such considered that this is an essential element of the mitigation strategy and it should be clearly defined in the Executive Summary.

O-5-3

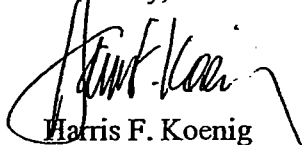
Lastly, it is requested that you provide us with a copy of a traffic impact study that has been performed in the past 24 months that addresses the project's impacts on levels of service on surrounding roadways and intersections. We believe that significant deterioration of levels of service that are related to this project will need to be mitigated as part of this project.

O-5-4

In summary, while we support the University's plans to expand and enhance its stature as a premier University in our community, we strongly believe that traffic impacts need to be mitigated, that access be maintained during and after the project's implementation, and that such mitigations be planned and funded prior to undertaking this project or specific phases thereof. We stand ready to provide whatever assistance we can to the University in developing these mitigations. If you have any questions or comments regarding this correspondence, please do not hesitate to contact me at 619-229-3172.

O-5-5

Sincerely,



Harris F. Koenig
Chief Executive Officer

Cc: Stephen L. Weber, President, SDSU
Pejman Salimpour, M.D.
Pedram Salimpour, M.D.

Navajo Community Planners, Inc.
c/o John F. Pilch, Vice President
6224 Rose Lake Avenue
San Diego, CA 92119

July 26, 2007

Mr. W. Anthony Fulton, Director
Facilities Planning and Management
Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 921182-1624

Re: Comments on the Scope and Content of the Proposed Draft Environmental Impact
Report for the SDSU 2007 Campus Master Plan Revision

Dear Mr. Fulton:

On July 16, 2007, the Navajo Community Planners, Inc. met at a regularly scheduled meeting at which a quorum was present. A Motion was made and seconded to recommend the following comments be submitted regarding the EIR for the revised 2007 SDSU Campus Master Plan. This motion carried unanimously. Therefore, Navajo Community Planners, Inc. submits the following comments to the SDSU 2007 Master Plan Revision Draft EIR.

I) TRANSPORTATION AND TRAFFIC

The overall traffic analysis in the EIR is faulty for many reasons, especially those that are identified below. Navajo Community Planners, Inc. ("NCPI") would request that the following data be corrected to reflect an accurate assessment of traffic impacts.

A. The Vehicle counts for the college avenue segment from Del Cerro Blvd. to I-8 ramps are not generalizable.

O-6-1

SDSU's Draft EIR states its experts conducted traffic volume counts at inappropriate times, resulting in skewed Average Daily Totals (ADTs).

With respect to the segment of College Avenue from Del Cerro to I-8, it appears the data for this street segment is invalid, as it does not take into account the traffic volume when school is in session. It appears SDSU's traffic experts must conduct a new study, taking new traffic volume counts for this segment.

Moreover, the EIR failed to account for the traffic impact on all of the elementary schools in the affected area because it failed to identify Temple Emanuel.

B. Missing analyses for residential intersections affected by the Adobe Falls Project.

Your traffic experts state that, according to the San Diego Traffic Engineering Council (SANTEC) Regional Guidelines, a Traffic Impact Analysis must be performed for any intersections to which 50 peak hour trips are added. Yet, there are no analyses performed for any of the unsignalized intersections within the residential area surrounding the proposed

O-6-2

Adobe Falls project. It is clear at least one or more of these intersections will suffer an increase of 50 or more trips during the peak hours, and I would like this addressed and discussed specifically within the report. Also, the existing uniquely sloped grade is not addressed, along with the significant traffic impacts to Adobe Falls Road.

O-6-2
Cont.

C. Impact of Adobe Falls on Emergency Health Services

O-6-3

The traffic analysis fails to incorporate the significance of the impact of the additional Adobe Falls units on emergency medical services both in terms of access due to increases in traffic.

D. Missing data for trips generated by Adobe Falls project.

Parks: There are varying estimates of the amount of "park space" within the DEIR. According to the project description, there will be approximately 14.5 total acres of park/open space. Later, SDSU estimates there will be 20.6 acres of park space, at a rate of 5 trips per acre, yielding 103 daily trips generated by the project

SDSU should specify the exact acreage for its intended park space, because the aforementioned numbers are inconsistent. Further, SDSU should specify whether its parks would fall within the "developed park" or the "undeveloped park" category, as defined by the San Diego Trip Generation Manual. The difference is significant in that a "developed" park will generate approximately 50 daily trips per acre, while an "undeveloped" park will generate 5 ADT/acre. The EIR states that Adobe Falls will be restored and trails put in place to allow the public to enjoy the area. However, the EIR does not account for the potential traffic generated by the attraction of the only waterfall in the City of San Diego. Nor does it account for the impact of foot traffic on the environment, such as the birds, gnatcatcher and others, who nest in the area.

O-6-4

Multiple Dwelling Units: SDSU claims the Adobe Falls development is a "low-medium" density development of approx 16.4 units per acre. However, in calculating the trips generated by the project for 150 of the units in the "lower village", SDSU relies on the figures for a multiple dwelling development with a density of more than 20 Units per acre. By doing this, SDSU calculates these 150 units will generate only 6 trips per unit as opposed to the 8 trips/unit that are generated by a development with a density of under 20 units. As a result, SDSU has undercalculated the daily trips generated by at least 300 trips per day. SDSU must correct this calculation.

O-6-5

E. Misclassification of residential streets

The San Diego Traffic Manual does not assign any rating other than a "C" for subcollector streets, which have a capacity of 2,200 ADT. Thus, SDSU's assignments of any other LOS rating for those streets lacks authority, and Draft EIR contains no explanation of the methodology used to obtain those ratings. SDSU must explain this.

O-6-6

Further, it appears none of these residential streets is properly classified. According to the San Diego Street Design Manual, collector and sub-collector streets have a design speed of 30 mph. As all of the subject streets (Del Cerro, Rockhurst, Adobe Falls Road, Mill Peak, Helena, Arno, Genoa, Capri, and Lambda) have a 25 mph speed limit or less.

O-6-7

In addition, the San Diego City Planners, themselves, have recently classified Del Cerro Blvd as a "Local" street -- not a "Collector" Street. (See, Navajo Existing Conditions Data, Map 5

O-6-8

Transportation, City of San Diego Planning Department, April 19, 2004; www.sandiego.gov/planning/pdf/ecdc/navajo/5trnavajo.pdf). As a result, Del Cerro Blvd can only have a maximum capacity of either 1,500 or 2,000 ADT, depending on whether it is classified as a "Residential Local" or a "Commercial Local" street. Further, the remaining street segments are either "Residential Local" or "Low Volume Residential Local" streets with either a capacity of 1,500 or 700 ADT, respectively.

O-6-8
Cont.

Nevertheless, even under SDSU's classifications, the Draft EIR contains an error in determining the level of service for Del Cerro Blvd. SDSU claims the LOS of Del Cerro Blvd. is decreased from a "C" to a "D" apparently because the project will add only 780 ADT. (Draft EIR, Table 3.13-17.) However, SDSU forgot to include the 2500 additional ADT added at the segment of Del Cerro between Capri and College. This will result in an approximate ADT of 7,300. At 7,300 ADT, even under to SDSU's inaccurate classification, the LOS of Del Cerro Blvd. becomes an "E" -- which means the project will, without a doubt, yield a tremendously significant impact there.

O-6-9

II) SDSU MUST MITIGATE TRAFFIC ISSUES

SDSU claims it is not responsible for making the traffic improvements required by their project to mitigate the significant impacts caused thereby. The City of Marina case held otherwise. SDSU is subject to the provisions of CEQA. (§ 21080.09) CEQA requires SDSU to adopt feasible mitigation measures to avoid significant environmental impacts. (*Sierra Club v. State Board of Forestry* (1994) 7 Cal.4th 1215, 1233.)

SDSU may find mitigation measures (i.e., traffic improvements) infeasible if: 1. The mitigation measure is "within the responsibility and jurisdiction of another public agency" and 2) the mitigation measure has been adopted or can and should be adopted by such other agency. (§ 21081.)

First, SDSU has made no showing the City of San Diego, or any other local agency, either intends to, or is capable of, making the proposed traffic improvements, particularly at a time when California and San Diego are both in the midst of budget crises.

O-6-10

Second, SDSU has made no showing any local agency, as opposed to SDSU, is required to take measures to mitigate the traffic impacts of SDSU's own project. SDSU appears to claim these mitigation measures are under the jurisdiction of other local or state agencies. (DEIR, pp. ES-9 - ES-13.) If this were true, any developer could defeat the mitigation requirement by simply saying, "This road is a City road", or "This is a County road", etc. In this way, developers would hardly ever be subject to traffic mitigation requirements. CEQA should not be interpreted to permit such an absurd result.

Contrary to SDSU's assertion, this is not a case where a special assessment is being imposed on the university, or one tax-supported agency is trying to siphon tax money from another tax-supported agency. This is about CEQA requiring SDSU to *mitigate* the significant environmental impacts caused by its own project.

Finally, SDSU may not adopt any statement of "overriding considerations" or benefits prior to providing substantial evidence that the traffic mitigation measures required by this project are infeasible, as discussed above. Thus far, SDSU has not provided such substantial evidence.

III) ENVIRONMENTAL ISSUES

In addition to the faulty traffic data, the Draft EIR fails to account for the several environmental and wild life impacts in the Adobe Falls area.

O-6-11

A) Air Quality data are faulty

The draft EIR bases the air quality assessments on the assumption that the proposed project is consistent the City of San Diego General Plan and SANDAG growth projections. (Draft EIR, p. 3.2-12.) However, SANDAG forecasts that the 92120 area code will add only 230 multi-family units by the year 2030. Therefore, the 540 units of Adobe Falls outnumber that estimate by at least 310 units. Assuming 2.5 persons per unit, this will add at least 775 more persons to the 92120 area code than is currently planned for by SANDAG. Therefore, the Air Quality study must be reassessed with data that accurately reflects the impact of additional housing on air quality.

O-6-11
Cont.

B) Environmental impact data missing

The Draft EIR mentions the relationship of the San Diego River to the Adobe Falls project, but fails entirely to discuss the impact of the proposed project on the San Diego River. The San Diego River is a vital natural resource that would be directly impacted by the Adobe Falls project and these impacts must be addressed and mitigation measures proposed before any valid evaluation of the environmental data can be done.

O-6-12

More significantly, much of the environmental data, including the soils data, are derived from 30-year-old texts rather than on site testing. Because this data is used to base assumptions for mitigation measures, it is impossible to determine whether or not the mitigation measures would be effective. Moreover, the mitigation measures that are addressed are primarily off site plant mitigation and not actual preservation or improvement of the quality of Alvarado Creek or the San Diego River.

O-6-13

C) Geotechnical mitigation measures missing

The SDSU Geotechnical Report identifies an ancient landslide in the Adobe Falls/North Campus location. The report suggests that the ancient landslide is not an issue and therefore does not mitigate for it, despite the fact the EIR concludes that further study is required before any judgments can be made.

O-6-14

More significantly, however, is the casual mention of slope failure *known* to have occurred several years ago between Genoa Drive and Adobe Falls. Absolute no mitigation or discussion was included regarding the impact of this slope failure. Moreover, none of the mitigation measures include the Adobe Falls despite the express opinions in the report of potential environmental, ground water, and slope failures in this area.

O-6-15

D) Noise impact data are missing and faulty

The traffic noise impact data are based upon the traffic analysis reports. As suggested above, the traffic analysis is flawed; therefore it is impossible from this draft report to evaluate the noise impacts. Accurate noise data must be created based upon accurate traffic data in order to allow for a valid evaluation of noise impacts.

O-6-16

IV) ALTERNATIVE ANALYSIS

The Draft EIR only provides for three possible alternatives and ignores one of the most obvious alternatives to meet the University's goals. According to CEQA Guidelines §15126.6, discussion of each alternative should be sufficient "to allow meaningful evaluation, analysis and comparison with the proposed project."

O-6-17

One of the primary goals identified in the draft EIR is to accommodate additional students and staff. There are several possible alternatives that should be addressed before any decisions can be made.

1) San Marcos Alternative

The California Dept of Finance estimates SDSU and CSU San Marcos will *together* enroll only 12,740 more headcount students by 2011, and SDSU acknowledges this in the EIR

CSU San Marcos is already slated to enroll approximately 19,163 more ftes/or approximately 24,600 more headcount students when buildout is complete, which should be within the next 10 to 20 years. (See, *Student Enrollment at the CSU* www.calstate.edu/PA/info/enroll.shtml; and CSUSM Master Plan, http://www.csusm.edu/physical_planning/Facilities/Master_Plan.htm.)¹ This is nearly double the amount of growth currently projected for the region by the year 2011.

B) Brawley and Calexico Alternative

Further, SDSU's off-campus centers in Imperial Valley (Brawley and Calexico) together will enroll approximately 1300 more ftes, or approximately 1500 headcount students by the year 2010. (See, *Masterplan Revision, approved by CSU Board of Trustees, Minutes for September 16-17, 2003.*)

C) SDSU's current capacity

SDSU has the capacity to enroll approximately 3300 more students than it does today, because it has already done so in 1987 (without the benefit of additional facilities, etc. (See, www.cpec.ca.gov/OnLineData, *Enrollment for SDSU, 1987*[1987: 36,280 hc; 2004: 32,936.] Thus, there is no need to increase the enrollment ceiling for SDSU. Combined with the increased future student enrollment at CSUSM, and the off-campus centers in Imperial Valley, there is no need for SDSU to accommodate more than its fair share of the state's future student population – given the tremendous adverse impacts that will result to the College and Navajo communities by such action.

At the last public hearing held at SDSU, Mr. Fulton claimed that SANDAG has forecast SDSU's population to be 58,572 by the year 2025, so the growth projected by SDSU will be well within that forecast. This is absolutely not true. The EIR clearly shows the only thing SANDAG estimated was that by 2025, the county's *total* student population will increase by approx 114,610. Then, SDSU takes that number and extrapolates the 58,572 number themselves, by using the unsupported assumption that SDSU will continue to serve 24% of the county's student population.

V) ADDITIONAL ISSUES

In addition to the categorical problems identified above, the following issues must also be addressed.

A) 17% Grade Mill Peak Road

The traffic and noise analysis does not take into account the steep grade of Mill Peak Road, reported to be 17% grade. This would have a substantial impact on traffic capacities of Mill Peak Road as well as on neighboring residential streets.

O-6-17
Cont.

O-6-18

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O-6-21

B) Property Values and Quality of Life

The proposed Adobe Falls development will negatively affect property values and the quality of life for the homeowners in the Navajo Community because it is in direct violation of San Diego's general plan and the Navajo Community plan.

Specifically, the project conflicts with Goal #5, which is to:

"Preserve and enhance established neighborhoods by establishing performance standards to guide the conservation of valued existing neighborhood characteristics, encouraging private investment and financing for preservation of established neighborhoods. . . ."

The Adobe Falls project is contrary to the San Diego City Council's "Objectives of the 1990 Growth Management Program". Specifically, Objective #1 is to "Protect environmentally sensitive areas" such as Adobe Falls; and #2 is to "Protect single family neighborhoods from incompatible development".

The proposed Adobe Falls apartment development conflicts with the Navajo Community plan, specifically:

The Residential Overall Element Objective: Which is to maintain and enhance the quality of existing residences and encourage the development of a variety of new housing types with dwelling unit densities primarily in the low to low-medium range.
Open Space Retention Objective: Which is to preserve existing open space in the community prior to development.

Circulation Overall Objective: To provide residents with safe, ready access around as well as in and out of the community with minimal environmental damage.

Community Environment Overall Objective: To preserve and enhance the natural beauty and amenities of the community.

SDSU states the project meets the objective of "low-medium" density, as there will be 16.4 units per acre. However, the Navajo Community Plan defines "low-medium" density as only 10-14 units per acre. (Navajo Community Plan, Table 1, p. 16.)

SDSU's proposed development directly conflicts with local zoning ordinances. The area in question is zoned as RS11, meaning the area is zoned for 1 single-family residence per a minimum of a 40,000 square foot lot.

C) Cal-Trans Route 8 Expansion

Route 8 will most likely ultimately need to be expanded to accommodate increases in traffic. The proposed Adobe Falls project would interfere with the expansion of the freeway since the proposed development includes the land that would need to be used for the expansion of the 8.

D) Alternate Route to Waring Road through the Smoketree Condominium Complex

This alternate route is unacceptable, due to the current traffic conditions on Waring Road, especially during the morning rush hour. The impact here is significant and beyond being mitigated. Further, there is no evidence that the Smoketree HOA is willing to even discuss this route through their property, leaving eminent domain as a distinct possibility.

O-6-22

O-6-23

O-6-24

O-6-25

O-6-26

O-6-27

E) Consideration of a tunnel from Adobe Falls to the SDSU campus

This alternate route has not been considered by SDSU, due to financial considerations. However, given the impact on the environment, by selecting the alternate route to Waring Road, the cost of a tunnel, projected to be \$16-20 Million, is much more desirable to the community.

O-6-28

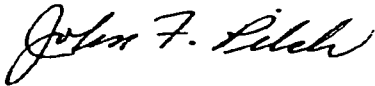
F) Property Values and Quality of Life

The diminution in property values in Del Cerro and Adobe Falls is a certainty, if the project is developed as proposed. This will have a marked impact on the quality of life of current residents and future residents, should they decide to reside there. The quality of life for wildlife and bird life in the areas of the proposed project will certainly diminish, due to increased vehicle traffic on residential streets and foot traffic in the habitat and park in the vicinity of Adobe Falls itself.

O-6-29

For all of the above reasons, NCPI rejects the Master Plan proposed by SDSU and requests that all concerns raised in this memorandum be addressed.

Sincerely,



John F. Pilch
Vice President
Navajo Community Planners, Inc.

Stephen Chan
 5678 Adobe Falls Pl
 San Diego, CA 92120
 619-582-2464
 619-582-2648 (Fax)
stevechan@cox.net

June 12, 2007

Dear Sir or Madam:

This letter is in opposition to the draft EIR which SDSU recently published on their website. Other than the reduction of the overall number of units from 540 to 348, I see very little to differentiate this draft EIR from the past EIR, particularly with respect to the inevitable traffic impact to the Del Cerro community.

- I-1-1

The installation of additional stop signs, speed bumps, etc., wholly fails to address the actual volume of traffic which will certainly result from the addition of 348 units. In fact, such measures will probably make a bad situation even worse. Even today, there can be significant delays on Del Cerro Blvd as motorists make a right turn onto southbound College Avenue. The addition of thousands of daily vehicle trips on streets which were clearly designed for much lower loads, and directing that traffic past two schools, is simply a recipe for disaster. Drivers will ultimately divert their attention to Lambda and Rockhurst, and many will be tempted to make a left turn onto northbound College Avenue, which is sure to lead to serious traffic collisions.

- I-1-2

Frankly, the ADT figures expressed in the draft EIR, particularly as it pertains to Adobe Falls Road, seem questionable at best, and fraudulent at worst. Opening the gate which presently separates Del Cerro from the Smoketree development may help to make these questionable numbers "fit" within the confines of this traffic study, but it is also one further step towards diminishing the quality of life and enjoyment which has existed in Del Cerro for over 40 years.

- I-1-3

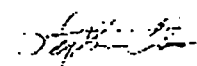
SDSU needs to propose an alternative access to the Adobe Falls project, either as a direct on/off ramp to/from Interstate 8, or some sort of modification to Waring Road, not unlike the road which currently connects Mission Gorge Place and Waring Road. SDSU could still design emergency access through Del Cerro, much as what exists at the bottom of Adobe Falls Road presently. I dare say that most Del Cerro residents would have no objection to installing a gate which could be opened in case of an emergency which closed the primary access road. As an alternative, confining the lower village access to Adobe Falls Road (West) to Waring, with no connecting road to the upper village, which would be served primarily by Mill Peak and Genoa, would go a long ways towards keeping traffic levels manageable throughout Del Cerro.

- I-1-4

I urge the Trustees to personally visit the Del Cerro community to better appreciate the concerns of residents prior to making a decision on the EIR.

- I-1-5

Respectfully,



Stephen Chan

Herman H. Husbands
6375 Elmhurst Drive
San Diego, CA 92120

June 19, 2007

Ms Lauren Cooper
Associate Director
Department of Facilities Planning, Design and Construction
Administration Building, Room 130
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RECEIVED
JUN 20 2007
Facilities Planning, Design
and Construction

RE: Draft EIR SCH No. 2007021020

Dear Ms Cooper,

Your announcement, regarding the referenced Draft EIR, does not address all the impacts on the area to the north of I-8 where additional housing is planned for faculty and students. While the draft EIR does admit to serious impacts regarding aesthetics/visual quality, air quality and transportation/circulation, there are other major environmental impacts that have been glossed over by the report: Geotechnical/Soils, Land Use and Planning, Population and Housing, and Public Utilities and Service Systems. There should be one more category that was not properly addressed: Impact on Wildlife and Other Potential Endangered Species. This environmental impact has been glossed over in the EIR.

I-2-1

Let's review those issues which do not appear to be adequately addressed at this time:

1. Geotechnical/Soils. To protect the property that is north of the proposed building site, an enormous investment in soil stabilization must be made by SDSU at State taxpayer expense to ensure that all the soil is sufficiently stabilized in order to prevent foundation movement of the existing residences in Del Cerro north of the proposed construction. This project may jeopardize the residential property in a manner that may not be possible to address from a monetary standpoint nor from a safety standpoint since San Diego is in a Seismic Zone 5 region. To ignore such a serious impact on the residential housing seems quite callous on the part of SDSU. This issue alone is sufficient to terminate any further consideration of your plan for this area(north of I-8 and west of College Avenue).

I-2-2

2. **Land Use and Planning.** The area north of I-8 and to the west of College Avenue is a wildlife habitat and the number of endangered species that occupy the area has not been addressed in the report. But equally as important is the canyon beauty that supports the wildlife habitat that is a characteristic of the San Diego area. While SDSU has proceeded to eliminate such wildlife habitat on the south side of I-8, to proceed to do so on the north side is unforgivable. Such a plan demonstrates that SDSU has no respect for the community in which it exists and is, simply stated, land greedy, regardless of the expense to its community and neighbors. The density of the land use in the area is far beyond what is reasonable for an established residential area. I-2-3
3. **Population and Housing.** The density of the proposed housing is absurd with respect to the area involved. The specific area is residential housing and the property values would plummet should SDSU attempt to replicate the high rise type structures that would be needed to house the numbers of people intended. While it is SDSU's right to build whatever structures are required on their campus site, to destroy the property values of the people of Del Cerro should be unacceptable to the Del Cerro community. I-2-4
4. **Public Utilities and Service Systems.** The existing utility systems have not been upgraded and, therefore, would be overtaxed if an additional housing burden, as SDSU has suggested, would be imposed on the existing system. And the systems that are involved are the entire spectrum of utility and transportation systems: water, gas, sewer, electricity, surface streets, communications, and traffic safety and congestion increase. These systems would be both costly to expand and all the expansion cost should be borne by SDSU, not the taxpayer. But more importantly, the entire existing community would be negatively impacted by such an increase in housing which serves to defeat the concept of building on the north side of I-8. I-2-5
5. **Impact on Wildlife and Other Potential Endangered Species.** The State of California has demonstrated repeatedly that it is an environmentally friendly state with its present governor promoting the "Green Environment" as a basic premise of his administration. The concept of building housing to the north of I-8 and west of College Avenue is simply destroying the environment and totally disregarding the protection of wildlife and potential endangered species that currently occupy the area. SDSU has completely ignored this critical environmental issue in its environmental impact report. I-2-6

It is suggested that SDSU consider the following plan with regard to any anticipated expansion of the current university infrastructure:

1. That SDSU remain south of I-8 and confine any mid- to long-term plans to that area. If both SDSU and the State of California wish to ignore the environmental implications of further development at the immediate campus site, then the current administration should be held accountable for their actions and any environmental consequences. I-2-7

2. That SDSU develop a plan of action that will purchase property to the south of the south edge of the current campus and plan expansion on the basis of land availability for future purchase. As part of this plan, the fraternity and sorority facilities might be combined in such a manner as to free land through compression of the facility footprint in order to provide some expansion in the near- to mid-term future. —I-2-8
3. That SDSU represent itself as a community leader with the condemnation of mini-dorms which destroy the residential values of the homes that immediately border the mini-dorms. Mini-dorms are an expedient, not a long-term solution. SDSU has not represented itself as a community leader for a very long time. In fact, it frustrates me that, as a graduate in the Business Administration program, the university has promoted itself negatively in the community the last few years vice pursuing the role of community leader, the reputation that the university possessed when I graduated in 1973 with my MSBA. —I-2-9

The efforts of SDSU are transparent – bully its way into a position of building residential units where the environment is destroyed, property values are destroyed and the community residential life is destroyed for the sake of SDSU. That is not an acceptable proposition in my opinion. Your Draft EIR is flawed and incomplete. SDSU should remain south of I-8 and confine its building to that area which will not represent destruction of the environment. Due to the very nature of the SDSU site, the campus administration should recognize what space limitations are imposed upon its growth and plan accordingly. This is a matter of (1) destruction of the environment and (2) property devaluation. —I-2-10

Sincerely,



Herman H. Husbands
Colonel USAF(Ret)

RECEIVED
JUN 20 2007Facilities Planning, Design
and Construction

June 20, 2007
4962 Cresita Drive
San Diego, California 92115

Lauren Cooper
A.D., Dept. of Planning, Design & Const.
Admin. Bldg, Rm. 130
SDSU
5500 Campanile Drive
San Diego, California 92182-1624

Dear Ms. Cooper:

I have reviewed the revised EIR and fail to note significant change from that offered in the 4/17/2007 preliminary report of the Campus Master Plan.

Per the enclosed letter to Dr. Stephen Weber, community issues continue to be overlooked or misrepresented in the latest plan revision.

I-3-1

Of particular concern is the failure to identify and mitigate traffic flow, noise and pollution issues. In addition the report fails to identify a significant geologic Hazard, impact of the Lake Murray Dam break due to earthquake activity, and effect on the Adobe Falls residential project area.

I-3-2

Shared offsite costs in the 2-39% range is vague and reflects on a lack of real planning and mitigation of the financial impact to the immediate community and City of San Diego. Earlier reports of 45,000 FTES and now 35,000 FTES would appear to be a shading of the real objective of student enrollment. 10,000 more people in and around the campus will have a significant impact on the quality of life for all community residents. In conclusion the latest draft of the Campus Master Plan is vague, ambiguous and in need of real change.

I-3-3

Sincerely,


Robert L. Berlet

encl.

cc. J. Madaffer, City Council, 7th District, City of San Diego
CACC
Jerry Sanders, Mayor, City of San Diego

RECEIVED
JUN 20 2007Facilities Planning, Design
and Construction

February 19, 2007

4962 Cresita Drive
San Diego, California 92115

Dr. Stephen Weber
Office of the President
5500 Campanile Drive
San Diego, California 92182 8000

Dear Dr. Weber:

Your letter of January 29, 2007 outlines an ambitious program to expand the facilities and improve the educational environment and experience of future students and support staff at SDSU.

As a 35 year resident in the immediate single family residential area of the University I have observed the unabated expansion of the campus. On site and off site improvements have been completed to serve an ever increasing student body. Over these years there has been one constant which has dramatically affected the single family living standards.

In summary this constant can best be characterized as the willful neglect of the single family resident's property standards and related quality of living issues. Ever increasing air and noise pollution from increased traffic (public and private automobile) on the surface streets, noise from emergency response vehicles, public safety demands on City of San Diego Police and Fire, trash strewn streets and rights of way; minimally maintained streets, offsite commercial venues (of marginal economic viability) dependent on income from college students, poorly maintained single family residences which have been which have been taken over by student rentals, general disregard for the College Area Community Plan (recent attempts to rewrite the plan without regard to the standing plan approval), are just a few of the problems which delineate the ongoing conflict between the University and the community.

Yes, the University does contribute to the economy of the neighborhood. I would submit that there is a gross imbalance on the return of tax dollars that support the University. As a public university the largest share of operating expenses are covered by the public tax dollar. Absent an economic partnership with the immediate community little of the economic activity generated by the school is returned directly to the residential

community. This is a particularly acute situation in the case of SDSU due to the fact that it is a commuter school. Absent an adequate space and infrastructure plan to expand and accommodate more student housing is a format that will continue to exacerbate the lack of a shared economic support for the SDSU residential community.

As outlined in your letter the expansion plan grossly ignores the needs of the single family residents and support structure of the college area. Implementation would further degrade the ability of the City of San Diego to provide proportionate and proper services to the single family residents in the college area. Traffic, noise, public safety, offsite infrastructure construction and support, adequate onsite housing (including the provision for proper rental/dorms facilities -1400 additional spaces is a farce given a plan for 10,000 more students), viable commercial venues which would be both complimentary to the single family residents and students, and adequate public safety services which allow for meaningful support of residents and students are all issues that should be addressed.

Clearly there is limited physical space to address expansion within the present campus boundaries. Unable to adequately address and meet the needs of the surrounding community SDSU should look to other areas of the county unless the University is prepared to meet the requirements of its single family neighbors, community planning group and fire and safety services of the neighborhood surrounding the campus.

It is neither equitable nor prudent to continue to ask the community to support or participate in the SDSU expansion without direct support from the University to correct these deficiencies.

Thank you for your cooperation and interest in addressing these issues.

Sincerely,

R. L. Berlet

Cc: University Relations & Development, SDSU
J. Madaffer, City Council, 7th District, City of San Diego
CACC
Jerry Sanders, Mayor, City of San Diego

Sue Braun

June 25, 2007

Mr. Anthony Fulton, Director
Dept. Facilities Design, Planning & Construction
/San Diego State University
5500 Campanile Dr.
San Diego, CA 92182-1624

Dear Mr. Fulton,

My husband and I have seen the revised plans in the newest draft of the EIR for the Campus Master Plan. We appreciate the changes made thus far, but still feel that the density planned for Adobe Falls is too high. In fact, we feel that almost anything in that location would be too much, given the lack of 2 way access in and out of the area. We worry a great deal about how people and emergency vehicles would get in and out given a natural disaster of any kind. The environment in that particular area is ripe for a fire or flood.

I-4-1

Sincerely,



Susan Braun

RECEIVED
JUN 27 2007
Facilities Planning, Design
and Construction

Lauren Cooper
Associate Director, Facilities Planning, Design and Construction
San Diego State University
5500 Campanile Drive
San Diego, California 92182-1624
(619)594-5224

RECEIVED

JUN 25 2007

Ms. Cooper

Facilities Planning, Design
and Construction

Half of the residents that live on Joan Ct. have back yards that front Montezuma Blvd. between Collwood and 54th St. Several of these residents have expressed concern that the current level of traffic noise is excessive. Further more they are concerned that the growth associated with S.D.S.U.'s Master Plan will exacerbate the existing problem. They would like to see a sound barrier erected.

I-5-1

After reviewing the S.D.S.U. Master Plan E.I.R. we would like you to address several concerns.

1) It appears that the noise monitoring device on Montezuma was placed at the intersection of Campanile and Montezuma, appx. 2400 feet from the area of concern. We are wondering how an adequate sampling can be done from such a distance. Especially since the majority of traffic going up Montezuma then takes a left into the parking structure at 55th never reaching Campanile.

I-5-2

2) Table 3.10-5 doesn't show a segment study was done between Collwood and 55th St. and therefore the current conditions and the impending impact isn't fully understood.

I-5-3

3) The Montezuma road segment that backs up to Joan Ct. between Collwood and 55th St. is a RS1 neighborhood and would have different DB requirements than the two bounding segments.

I-5-4

Please advise us on your intent and any action that will be taken surrounding these concerns.

I-5-4
Cont.

Mitch Younker
5446 Collier Ave.
San Diego CA. 92115
583-9033

Jerry Satuloff

5581-C Adobe Falls Road, San Diego, CA 92120
Res: 619-583-4258 Cell:619-895-2006
Email: jersat@cox.net
February 27, 2007

I-6

Lauren Cooper
Associate Director – Facilities Planning
SDSU
Facilities Planning, Design and Construction
5500 Campanile Drive
San Diego, CA 92182

RECEIVED
JUN 28 2007
Facilities Planning, Design
and Construction

Subject: 2007 Campus Master Plan EIR

Dear Mr. Cooper – et-al:

It just doesn't stop! SDSU is Hell bent to expand, no matter the consequences, even if it destroys a neighborhood. It hasn't been sufficient to destroy the campus neighborhood by allowing mini-dorms, now SDSU desires to ruin Del Cerro and Adobe Falls, just because the land is there.

I-6-1

As a resident of Smoke Tree Adobe Falls, a 100 unit peaceful condominium neighborhood, I believe I can speak for a good percentage of our residents, there is no way Smoke Tree is going to give in to SDSU's desires to run traffic from the to be built condos. This is our property, we have built our neighborhood into a peaceful community, so count on a fight!

I-6-2

It is not that we are against SDSU. We believe in the university and what it has and will accomplish. It is a wonderful asset to San Diego, but let's not destroy a peaceful neighborhood whose roads are narrow, are close to many front doors and cannot carry additional traffic.

There are so many alternatives, local areas in non residential neighborhoods which are better suited such as around the Grantville Trolley Station; north on Mission Gorge which is slated for redevelopment and how about the possibility of buying us out of Smoke Tree. Now there is an interesting option. The purchase of these condominiums, now averaging in price in the mid \$400,000 provides a ready built community with future access to the undeveloped property.

I-6-3

One of these options could be a viable solution, they should be investigated. If, SDSU is the concerned institution it claims to be, then let's show concern for maintaining the neighborhood. What are you teaching SDSU students in going against neighborhood's desires

I-6-4

It is incongruous that SDSU has such deep pockets of our tax money while we must again tax ourselves to fight an undesirable expansion program.

Sincerely,

Jerry & Marsha Satuloff
Smoke Tree Adobe Fall Residents

Dear Doctor Weber / *Lauren Cooper*

July 9, 2007

In response to your draft EIR, please reconsider any use of the Smoke Tree condo area roads or flood channel. Our roads are private and cannot accommodate additional traffic. The flood channel rests on our (Home Owner's Association) property and is flanked on both sides by property which the Association owns. It would be dangerous for residents to walk to the mailbox, walk pets and generally walk the property. The area is too congested and small for any other traffic than what we have now. Parking along the street or ingress/egress from garages would be a huge problem with more cars going by.

I-7-1

We ask that you confine your building to the south side of Highway 8 instead of spilling out on this side. We have enough problems with students renting some of our units as indeed you have with the backlash from the mini-dorm issue. We are concerned that, over time, the housing you are intending to build will become student dorms instead of the use you now propose.

I-7-2

Smoke Tree's roads are privately owned and maintained. It would not be in our best interests to allow additional traffic through our area. Alternative access routes 1a and 1b are completely unacceptable. Alternatives 2 or 5 would seem to best suit your needs.

I-7-3

You are already using our property to access the Adobe Falls site. That access, however, is subject to revision since the original purpose (botany/environmental studies) would be significantly changed. Perhaps you could gain alternative access through the adjacent city owned property designated for, but never developed as, park use.

I-7-4

Sincerely,

Joe Colmie
Joe Colmie



Mr. Joseph Colmie
5667 Adobe Falls Rd Unit A
San Diego CA 92120-4659

**Roy H. Seifert
Land Architect**

10780 Queen Ave. La Mesa, Calif. 91941 Fax: (619) 440-0164 E Mail:
royhseifert@cox.net

07-07-07

Stephen L. Weber, President, San Diego State University

Honorable President Weber:

In the 1950's the campus was in harmony with the community with a student population of approximately 3,000. At that point, the site's Value Added Design was still intact. The approach to the campus was pleasant. The area's topographical features were still intact. SDSU was in harmony with the community.

A new Master Plan in the 1960's called for a rigid parallel and perpendicular building and walk system pattern that developed a formal unnatural campus atmosphere and a severe rigid grading concept, ignoring the existing natural features. This engineered concept is now even more dominant in the new Campus Master Plan. To ease the student dorm demand and the continuously increased student population, the community and the campus would easily descend into mediocrity. The new Campus Master Plan is wrong from an environmental, ecological and political reality. The new plan is intrusive that is generating strong political opposition. The new plan establishes a jammed warehouse setting that creates an undesirable campus atmosphere. The current plan promotes an overbuilt culture, an overcrowded community jammed with traffic and illustrates poor land use design management education. The route we are going is not a feasible solution to build a new campus to teach environmentally oriented and creative engineering solutions, such as energy conservation.

I-8-1

There is a way out, however. The solution is to establish a committee to study new sites for an additional campus. The new campus site can become an environmental and ecologically best use of the land. The new campus site can become an enhanced means of directing the goals of an enlightened educational institution.

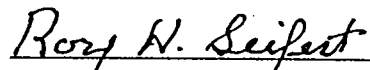
SDSU needs to go on record now to build an additional campus to handle the increased population on a site that can be integrated with the community. The current Campus Master Plan is augmenting a negative social and economic impact that will contribute to a disinterested society in a city already overdeveloped. It is in the community's interest to hold the Chancellor's Office responsible by forcing local campuses to develop an innovative and character building learning environment. As the President of a great university, here is an opportunity and responsibility now to open the eyes of the Chancellor's office before it is too late.

The only hope to stop destroying the current community character is to recognize that building a visually walled city is counter productive to building an improved society, a major goal of SDSU. SDSU's goal must recognize that the learning of students could be greatly enriched and extended over what is ordinarily possible in the classroom. A sensitive campus design plan will help you reach this goal. Public education is to develop students to be sensitive to a built environment that could provide not only increased learning but also an increased motivation for both the student and the staff. Building a high-rise campus will destroy the goals of teaching the goods of life. Everything cannot be taught in the classroom.

I-8-1
Cont.

We were introduced by Dr. Darrell Holmes, former Executive Dean of SDSU and retired President of Northern Colorado University. Dr. Holmes worked with me as an Executive Administrator Consultant for 20 years (from 1980 through the year 2000. We worked together on projects in Mexico, Taiwan, Malaysia, and here in California.

I-8-2


Roy H. Seifert, Land Architect

- Enclosed: 1). The social and economic impact of the SDSU parking lot photo featured in the San Diego Union,
- 2): A reproduction of the SDSU parking lot design concept that was built at the intersection of Interstate 5 and College Avenue;
- 3): Article in the San Diego Union listing Added Value Design Characteristics to guide the design. The Del Cerro Community praised the creativity of the parking lot design to lessen the visual and economic impact of a common engineering project after the project was built and before a single plant was installed.

The San Diego Union

SAN DIEGO, CALIFORNIA, SUNDAY MORNING, AUGUST 22, 1971

Seifert said he approached the assignment with this concept:

"Save or replace as many amenities of the site as possible.

"Grade with variables to add interest and retain some character of the original site.

"Allow the motorist as well as pedestrian a pleasant experience.

"Turn liabilities into an asset. Engineering problems

can be solved through an aesthetic design."

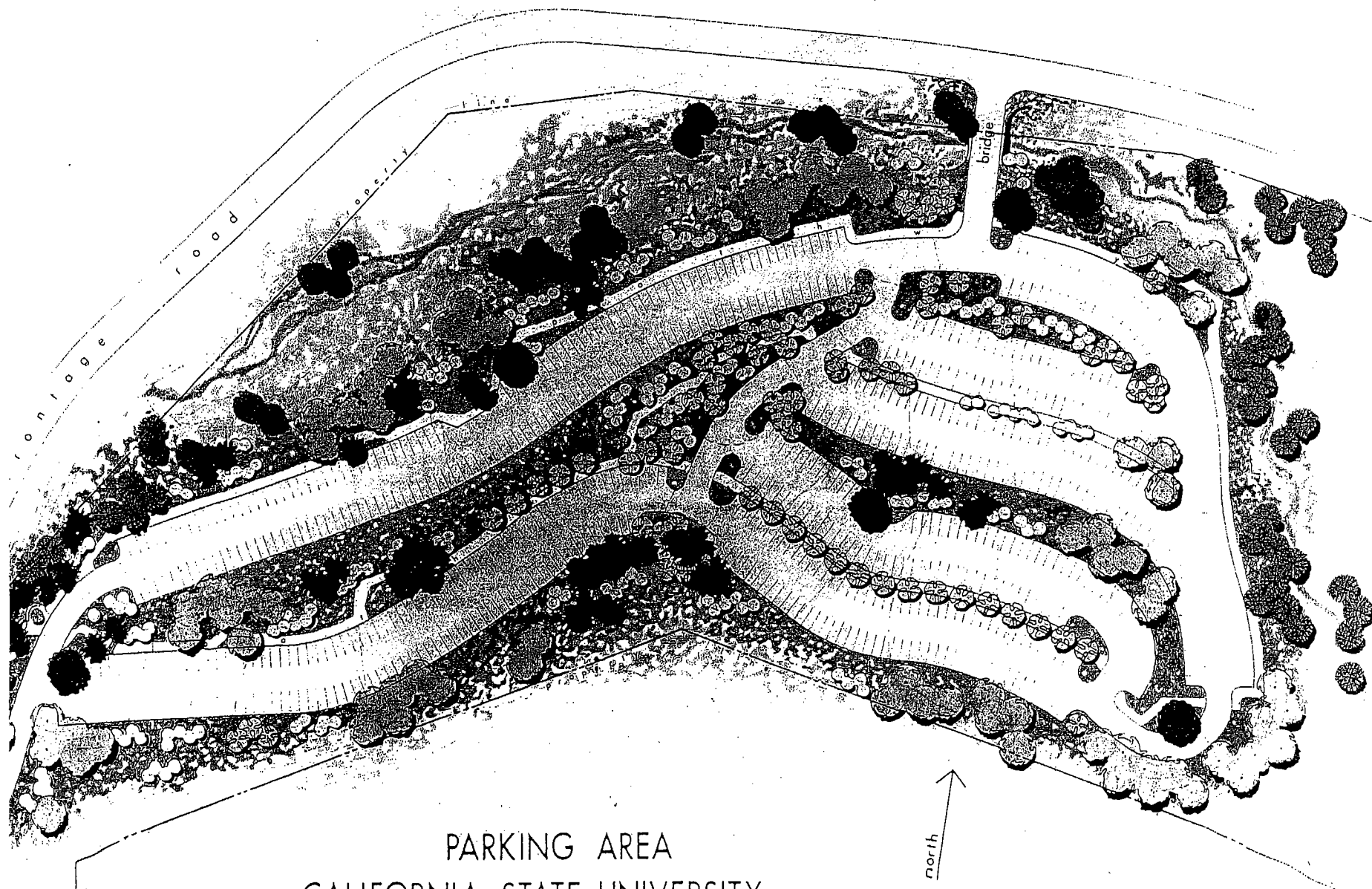
Seifert said that wild life still lives on the parking lot, mostly ground squirrels, but two foxes were recently sighted there. It is also a place where students in botany classes may study plant materials.

The project was two years in the planning and construction stages. Tony Cover, building coordinator at the campus, said the project cost about \$400,000, "reasonable for a hillside parking area," and was paid for entirely by student parking fees. From the most distant point, a parking stall is about one-half mile from the center of San Diego State's campus.

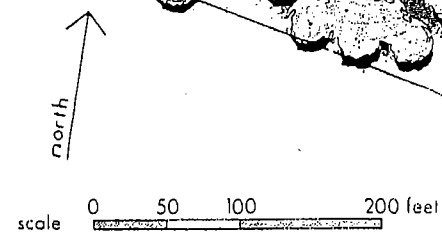
"Everything has a purpose in this parking lot design," said Seifert. "The rocks, the mounds, the pole sections are not only pleasing to the eye, but they serve a utilitarian purpose."



DESIGN FOR A PARKING LOT: Here's evidence of how you can landscape a parking lot into something of natural appeal instead of a sea of asphalt. Designed by landscape architect Roy Seifert, it is on San Diego campus, east side of College Avenue. Story gives further details.



PARKING AREA
CALIFORNIA STATE UNIVERSITY
SAN DIEGO



The San Diego Union

SAN DIEGO, CALIFORNIA, SUNDAY MORNING, AUGUST 22, 1971

By CLYDE V. SMITH

Real Estate and Building Editor, The San Diego Union

It has been said that good landscaping can make a modest home look like a million.

That, obviously, is an exaggeration, if the term million refers to dollars. But it is no exaggeration that good landscaping will add charm, appeal, and upgrade the appearance of a residence — and any other property, for that matter.

As far as dollars are concerned, the right landscaping will also add real monetary value and can be considered a prime investment for any home.

But what is right landscaping?

The dictionary has several definitions for landscape, both as a noun (a picture representing a view of natural inland scenery; the art of depicting such scenery; the landforms of a region in the aggregate) and as a verb (to improve or ornament by landscape architecture or gardening).

San Diego landscape architect Roy Seifert has still another definition:

"A landscape is anything you see, whether it is good or bad," he points out. "It can be a freeway or a parking lot, as well as a garden or a mountain. In fact, the largest land consuming element is roads and parking areas, mostly seas of asphalt. But it is still a landscape."

That obviously is true, however oversimplified the definition may seem. But the question is — what is good landscaping? Some difference of opinion rises on this subject.

Seifert says there "is lack of understanding, generally, on what the potential is in land design. The most important element in landscape design is topography."

Incidentally, Seifert was commissioned to landscape the latest parking lot at San Diego State campus and he accepted it as a challenge to create a facility with natural beauty, instead of "just a sea of asphalt." It was a remarkable achievement, which will be described in detail later in this piece.

Good landscaping means different things to different people.

Some home owners landscape with flowers and shrubs, trees and lawns. Others put the emphasis on rocks and water. Still others use a combination of these elements plus other materials, such as wood, masonry, even metal and art objects to shape the yard scenery.

Many garden landscapes, with lots of colorful flowers, require a great deal of maintenance. There may be need for frequent replanting of bedding plants to keep the color showing as the bloom seasons change. But if you like to garden, maintenance will be no problem.

Other busy home owners want natural beauty that requires little or no maintenance. This, too, can be achieved with proper landscaping through a design with other materials and limited use of plants and flowers, other than trees or shrubs.

In these days of the ecology minded, it may bring a challenge to say that man can improve on nature. Nature's beauty, many people are convinced, cannot be excelled.

But that is exactly what good landscape design strives to do, or at least to shape nature to man's own needs, to meet practical functions as well as personal appeal. In that sense, man is improving on nature.

Nature in the raw may be wonderfully beautiful. But untamed nature overlooks the requirements and living habits of man, and often, to some, is not so beautiful, such as an expanse of barren waste. It is pointed out, too, that nature is not consistent in its expressions, that its forms of beauty vary widely.

For instance, there is great difference in the beauty of a densely wooded forest or jungle and the appeal of the desert with its changing colors or the rugged grandeur of granite mountains or the weird, twisted forms of barren lava flows.

Yet each is beautiful in its own right.

But back to Seifert again. How can you landscape a parking lot into a thing of natural appeal instead of a sea of asphalt?

If you want visual evidence, go out to San Diego State campus and take a look at the new parking lot along the canyon on the east side of College Avenue, bordered on the north by Interstate 8. Except from a high vantage point, you won't be able to see it all at one glance because of the rolling contour. That was part of the design emphasis to get away from the sea of asphalt impact.

"I found landscape design for an institutional parking lot a great challenge," said Seifert. "The standard approach does not seek alternatives — only the engineering problems are considered. My hope was to provide a pleasant setting in a parking lot."

The 10-acre site provides more than 700 parking spaces on four terraced levels along the canyon side, but the first time visitor would not be aware of the enormity of the facility — simply because he would not see a vast expanse of asphalt.

Slopes, earth mounds and rocks break up the scene and give it a more natural appearance. Seifert's design even preserved the creek bed at the base of the canyon where an exit is provided by a curving bridge of interesting design that crosses the creek.

Native plants and granite outcroppings were left in some areas. Other boulders were placed for both design and utilitarian purposes.

A "random approach" was provided into the parking area. Row parking on the various levels is separated by the steep, natural slopes.

Random lengths of old telephone poles were placed in the ground along the borders of the parking areas. These

scaping: some difference of opinion rises on this subject.

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A "random approach" was provided into the parking area. Row parking on the various levels is separated by the steep, natural slopes.

Random lengths of old telephone poles were placed in the ground along the borders of the parking areas. These serve a double purpose, giving character to the design and also substitute for a guard rail to prevent or at least check the possibility of a runaway car from rolling down the hill.

Many acacia trees were planted in the "parking park" and native sycamores still grow in the creek bed. Other varieties of trees were also planted.

The upright lighting is basically two fixtures, on 12- and 25-foot standards, which become a part of the landscape and create variety. There also is ground level illumination.

Pedestrian paths wind through the parking lot on the borders of the parking lanes. The foot traffic is apart from motor traffic.

Seifert said he tried to preserve as much of the natural setting of the canyon side as possible. Even the meter boxes and equipment are camouflaged with cluster of the pole sections. Wood covers were used over storm drain inlets, which ties in with the terrain.



DESIGN FOR A PARKING LOT: Here's evidence of how you can landscape a parking lot into a thing of natural appeal instead of a sea of asphalt. Designed by landscape architect Roy Seifert, this is on San Diego campus, east side of College Avenue. Story gives further details.

6006 Del Cerro Blvd.
San Diego, CA 92120

July 13, 2007

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RE: Adobe Falls portion of SDSU's Master Plan and EIR

Dear Mr. Fulton:

As a resident of the Del Cerro community I wish to express my concerns regarding the Adobe Falls portion of the SDSU Master Plan and EIR. My main concern is the still unresolved issue of the adverse traffic and safety impacts to the streets of Arno, Genoa, Capri, Adobe Falls Road, Rockhurst, and Lambda streets, and by extension, the very considerable impact that this additional traffic will have upon the already congested intersection at Del Cerro Blvd. and College Avenue. This intersection is already the site of early morning and afternoon/evening traffic congestion, and to add the additional traffic generated by the Adobe Falls units would further exacerbate the problem. The only solution, in my opinion, would be to create completely separate access from Interstate 8, via an off-ramp and an on-ramp. Short of that, it seems that the project is very unworkable.

-I-9-1

The EIR invents levels of service (LOS) for the residential streets mentioned above and claims that these are found in the San Diego Roadway Classification Manual and LOS Table. I question this; residential streets have no LOS rating because their primary purpose is to serve abutting lots and not to carry through traffic from one place to another. Therefore, rather than accept this claim, SDSU should be required to conduct an impacts analysis based on the magnitude of the increase in traffic volumes of these streets, which would result from the increased population and increased traffic resulting from the occupation of the proposed units.

-I-9-2

My final concern is in regard to the proposal to encourage new usage of the Adobe Falls trails and waterfall. The additional traffic generated by offering access to this historical hiking site should definitely be taken into consideration. It, once again, points to the huge stumbling block that this portion of the Master Plan has failed to address - the lack of acceptable access to the project.

-I-9-3

I hope that you will consider my concerns.

Sincerely,
Patricia Isberg

Patricia Isberg

RECEIVED

JUL 17 2007

Facilities Planning, Design
and Construction

CC:

Greater Centurion Corp.
Governor Arnold Schwarzenegger
Senator Dennis Hollingsworth
Senator Christine Kehoe
Assemblywoman Shirley Horton
Assemblywoman Lori Saldana
Assemblyman George Plescia

County Supervisor Dianne Jacob

Councilmember Jim Madaffer
San Diego Unified School District
Superintendent Carl Cohn

July 26, 2007

Lauren Cooper, Associate Director of Facilities Planning, Design and Construction,
Administration Building Room 130
San Diego State University,
5500 Campanile Drive, San Diego, CA 92182-1624,
Fax: 619-594-4500.

Dear Ms. Cooper:

As neighbors we are writing to share concerns regarding the Draft EIR submitted by SDSU regarding the Campus Master Plan. We do not understand why this HUGE student influx must be absorbed by SDSU at the Montezuma Mesa Campus. There are other alternatives and other locations that could be used to meet the needs of a growing student population. This includes using land in the South Bay, sending students to other CSU campuses with more space, or markedly increasing the use of off-site or on-line learning.

I-10-1

Regarding 3.8.4 "Adobe Falls Faculty Staff Housing" Why is the University choosing to put multi-family dwellings in a neighborhood that currently consists primarily of single family dwellings? The University could meet the need to provide affordable faculty/staff housing and stabilize the neighborhood immediately adjacent to the campus by purchasing existing single family residences for use by faculty and staff. This would have the additional benefit of reducing the number of vehicles driven to and from campus.

I-10-2

Regarding 3.8.4.2 "Residential Goal: Maintain the predominantly single-family character...". As noted above, the University could be an active participant in this process by purchasing homes for use by faculty and staff. The University needs to find ways to actively encourage students to live elsewhere and use the Trolley or other forms of public transportation to come to campus. Building large dorms in a "mixed use area adjacent to the University" will have a detrimental impact on the "single-family character" of the College Area. The large dormitories proposed for the corner of Montezuma and College Avenue are mere blocks away from residential streets, churches, a synagogue, and an elementary school.

I-10-3

Regarding 3.8.4.2 "Transportation Goal": The plan gives inadequate information regarding ways traffic problems will be mitigated. Currently there are large lines of vehicles proceeding east on Montezuma waiting to turn left onto 55th or to do a U-Turn to enter the Parking Structure under the sports deck. Drivers frequently turn right onto 55th and do hazardous U-Turns without regard for pedestrians or other vehicles in order to avoid this wait. These traffic hazards are in close proximity to an elementary school (Hardy Elementary School).

I-10-4

The University should be aware that many of the students driving in the area do not observe traffic signs, creating hazards for children and the elderly. Any increase in students and traffic will lead to more problems.

I-10-5

There are many other issues which could be and should be addressed, but these are the most important issues for us. We are supporters of higher education and enjoy the opportunities that come with living in proximity to a university. We do not feel that the University is acting as a good neighbor

I-10-6

Please do not hesitate to contact us if we may provide any additional information.

Yours,

Martha and Russell Fuller
5705 Mary Lane Dr.
San Diego, CA 92115

619-265-5894

ROBERT G. STEWART
6337 DWANE AVENUE
SAN DIEGO, CA 92120
(619) 972-8740

July 16, 2007

Lauren Cooper
Associate Director
Department of Facilities Planning, Design and Construction
Administration Building, Room 130
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Reference: Draft Environmental Impact Report
SDSU 2007 Campus Master Plan Revision
Adobe Falls Faculty/Staff Housing, Upper Village
Comments and Questions

RECEIVED

JUL 17 2007

Facilities Planning, Design
and Construction

Dear Ms. Cooper:

The purpose of this letter is to offer comments and raise questions relative to the above referenced Draft Environmental Impact Report, specifically the Adobe Falls Faculty/Staff Housing, Upper Village.

The level of Analysis for this proposed use is "Project". The CEQA Guidelines indicate that the required information to be provided shall include design, construction and operations.

I-11-1

The only design information consists of a plot plan showing 48 units, all situated in duplex buildings, and text indicating 2 story configuration for 3 bedroom units with an average of 1600 square feet per unit.

There are no schematic typical floor plans or elevations nor information relative to building materials to be utilized.

As to operations, are the units proposed to be leased or sold?

I-11-2

As to the discussions regarding "Affordable" housing, how does SDSU propose to assure that these units will be made "Affordable"?

I-11-3

If the units are sold, are there provisions for SDSU to repurchase the units to assure that they remain in the affordable pool to facilitate SDSU utilizing the units on a continuing basis for subsequent faculty/staff personnel?

I-11-4

Can SDSU be explicit regarding "other special markets" – i.e., Retired Faculty Housing?

I-11-5

There appears to be an inconsistency concerning the number of units to be located in the Adobe Falls Upper Village. The (Revised) Notice of Preparation, page 7 of 61, 1.7.2.I, indicates 50 to 70 units. The Draft EIR calls for 48 units.

I-11-6

The courtesy of a response, as mandated by the CEQA Guidelines, will be appreciated.

I-11-7

Very truly yours,


Robert G. Stewart

July 17, 2007

Mr. Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Re: Adobe Falls Project

Dear Mr. Fulton:

After listening to your latest presentation at DCAC, I still am not convinced that your project is in the best interest of our community. The question of traffic entering and exiting on Del Cerro Blvd. continues to be a major issue, no matter how you present it.

I-12-1

The rode going west is only one lane and the road east widens to two, one lane being a right turn lane. In order to accommodate more traffic one lane or the other will have to be widened; at whose expense? And, will that continue on past Hearst Elementary? If so, that means much more traffic in front of the school. This is a very bad idea.

Add to this your intention to restore the Adobe Falls and trails so they can be enjoyed by the general public. This historical site will then become a very popular attraction, creating more traffic. The EIR does not account for the potential traffic which will be generated by this attraction. As a resident of Del Cerro, I need an analysis of these potential traffic impacts in the EIR.

I-12-2

Finally, while attending the June meeting of the DCAC I became aware of a new piece of information that I did not know about. Specifically that Leonard Bloom owns the adjoining piece of property next to the Adobe Falls Project. Your project will provide him the required access he needs to build his own project. Regardless if his project will be 1 home or 12, it will result in more traffic. After learning about this, I am even more opposed to your project.

I-12-3

RECEIVED

JUL 19 2007

Facilities Planning, Design
and Construction

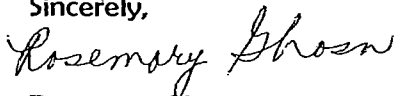
Mr. Anthony Fulton
July 18, 2007
Page -2-

I was never aware of this information, and I am sure that most of the other residents weren't either. Mr. Bloom is not a good neighbor to the Del Cerro Community. As you are well aware, he owns the property on the east side of College Avenue. In light of all the recent fires in the city, he is unwilling to clear the brush and debris on his property. As it stands, his property is a very real fire threat to the community, with years of dry brush, weeds and debris abutting homes, a gas station and across from a major hospital. He does the bare minimum to fulfill safety requirements, and only after stonewalling for as long as he can.

I-12-4

Frankly, Mr. Fulton I do not see this project as a good fit for our community and will not support it.

Sincerely,



Rosemary Ghosn
5611 Raymar Avenue
San Diego, CA 92120

Cc: Governor Arnold Schwarzenegger
Senator Dennis Hollingsworth
Senator Christine Kehoe
Assemblywoman Shirley Horton
Assemblywoman Lori Saldana
Assemblyman George Plescia
County Supervisor Dianne Jacob
Councilmember Jim Madaffer
San Diego Unified School District
Superintendent Carl Cohn
Board Member Katherine Nakamura
Mr. Leonard Bloom

Anthony Fulton
 Department of Facilities, Planning & Construction
 Division of Business and Financial affairs
 San Diego University
 5500 Campanile Dr
 San Diego, ca 92182

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JUL 17 2007

Facilities Planning, Design
and Construction

Mr. Fulton:

I have read the latest EIR and have great concerns that there are numerous facts that have been omitted..

The EIR never fully addresses the potential adverse traffic and safety impacts to Adobe falls Road, Milpeak Rd, Genoa Dr and Arno.. In Figure 8-4, the EIR states 1040 ADT will be generated by the project. However, these numbers are NEVER AGAIN mentioned or included in a significant impact analysis. I am a resident on Genoa Dr which will carry the "brunt" of traffic that will come from both the UPPER & LOWER units. I DEMAND full and analysis of the impacts to these streets and ask for the mitigation measures proposed for the significant traffic impacts there. (PARTICULARLY in light of the existing uniquely sloped grade.

- I-13-1

The EIR states that SDSU will purchase mitigation uplands to mitigate the environmental impacts they will cause by building in the Adobe Falls area. I ask SDSU to explain how they have the power to purchase these lands, but yet DO NOT have the power to purchase property elsewhere which would be suitable for faculty/housing and would not disturb a sensitive environmental habitat for various species of plants and animals.

- I-13-2

The EIR states ADOBE FALLS will be restored and trails will be put in place so the public can enjoy the area. From what I understand, this is the ONLY WATERFALL in the CITY OF SAN DIEGO.

****THIS TYPE OF RESTORATION WILL ATTRACT VISITORS FROM AROUND THE COUNTRY< AND IS INTENDED TO DO SO!**** YET the EIR never accounts for the traffic generated by such an attraction.

- I-13-3

SDSU has MISCLASSIFIED our streets and the EIR states that they have the capacity of 1500ADT> I insist that the streets of ARNO, GENOA, CAPRI, ADOBE FALLS ROAD, ROCKHURST and LAMBDA are LOW VOLUME RESIDENTIAL LOCAL STREETS with a capacity of only 700ADT per day.

- I-13-4

All of these streets are RESIDENTIAL streets and they do NOT have a LOS rating. Therefore the EIR levels which are stated are FALSE!

The EIR also states that DEL CERRO BLVD. already operating past its capacity by 170 ADT. I therefore DEMAND that SDSU acknowledge that ANY additional amount of traffic on Del Cerro Blvd. constitutes a SIGNIFICANT ADVERSE impact which must

- I-13-5

be MITIGATED or AVOIDED, particularly because this is the ONLY means of access/egress to the homes west of College Ave, and because it adversely impacts the safety of children/parents attending schools at PHOEBE HEARST and TEMPLE EMANU-EL.

I-13-5
Cont.

I point to the fact that the intersection at Del Cerro Blvd and College Avenue already operates at UNACCEPTABLE LOS of "E" in the peak morning hours. (EIR, p 3.14-23). Any amount of additional traffic constitutes a significant adverse impact, particularly in light of its UNIQUE location.

I-13-6

The EIR claims that SDSU will introduce SHUTTLE SERVICE in the future to mitigate this traffic problem. I DEMAND that SDSU disclose the FULL AMOUNT of traffic INCREASES without any decrease for "alleged shuttle service, until such time that they can provide evidence that the shuttle service will decrease traffic in any given percentage.

I-13-7

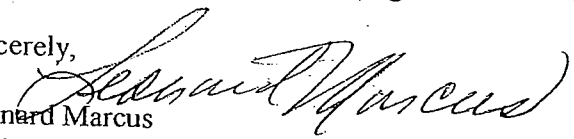
IN ADDITION TO THE EIR REPORT< I have heard that SDSU intends to "PARTNER" with Dr. Leonard Bloom for the UPPER VILLAGE project! With this parcel, SDSU can build another 8 units.. It was my understanding from all of the statements made by SDSU that it CANNOT purchase any property but has to make use of ONLY land already owned by the university..

I-13-8

I would appreciate your acknowledgement of this letter after reading it.

I-13-9

Sincerely,


Leonard Marcus

5640 Genoa Dr.

San Diego, Ca. 92120

**A resident of Del Cerro since 1972 **

Cathleen Kenney
5255 Joan Court
San Diego, CA 92115
Tel: 619/287-5368

July 19, 2007

Ms. Lauren Cooper
Associate Director, Facilities Planning, Design and Construction
San Diego State University
5500 Campanile Drive
San Diego, California 92182-1624

Dear Ms. Cooper

I live on Joan Court, South of Montezuma Road. Half of the residents of our street have back yards facing Montezuma Blvd. between Collwood and 54th Street. Even at present the noise on Montezuma is excessive, especially at night when we are trying to sleep. Those of us on the other side of Joan Court are also affected. We are all concerned that the growth associated with S.D.S.U.'s Master Plan will make the existing problems even worse. We propose that a sound barrier be erected.

I-14-1

In reviewing the S.D.S.U. Master Plan E.I.R. I note that noise level readings were not taken on the south side of Montezuma starting at the stretch of Montezuma approaching Collwood and up to the 55th Street turnoff into SDSU. (Most of the traffic never makes it to Campanile Drive where the noise level readings were actually taken). The stretch I just described is a residential zone (both single family residences and apartments) and I do not believe your study adequately addresses the impact of the increased cars, etc. In referring to the Environmental Protection Agency's recommendations and San Diego's code requirements, I see that the recommended maximum decibel levels for residential neighborhoods during the day is 55 db, and 45 db at night. EPA says a typical busy street generates 60 decibels and, if you factor in that heavy trucks and buses create 85 decibels, then it would appear that our neighborhood is being bombarded at unacceptable levels even now. And increasing the student population by the numbers SDSU proposes would greatly exaggerate that.

I-14-2

I would request that SDSU re-visit and re-measure the stretch described above and to advise me of your plan to address these concerns.

I-14-3

Sincerely,


Cathleen A. Kenney

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JUL 20 2007

Facilities Planning, Design
and Construction

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TOBY S. HARTMAN
 5637-C Adobe Falls Road
 San Diego, CA 92120
 (Smoke Tree Adobe Falls)
 E-Mail: Toby3518@sbcglobal.net

JUL 23 2007

Facilities Planning, Design
 and Construction

July 15, 2007

TO: Ms Lauren Cooper
 Associate Director, Department of Facilities Planning, Design and Construction
 Administrative Building Room 130
 San Diego State University
 5500 Campanile Drive
 San Diego, CA 92182-1624

RE: SDSU Masterplan and Draft EIR, North Adobe Falls Campus

Dear Ms. Cooper:

After reading the new draft EIR, I would like to reiterate some of my concerns re the Faculty and Staff residential plan at the North Adobe Falls campus. I live in the Smoke Tree Adobe Falls community. It is quiet, park like, small, and relatively private. The homes are condominiums, 2-4 attached at maximum, and single level. People can only drive at 15MPH. Neighbors walk their dogs or run along our streets, where the air is fairly healthy and the roads are relatively safe. There are no sidewalks. Our mailboxes are on the roads. Our roads are our designated firelanes. There is no room for cars to park in the streets, as they would block the fire access. People know each other and stop and quietly chat. It is a special enclave in the middle of city chaos. I have lived here since it was built in 1981. These were the reasons I, and many of my neighbors, chose this site. Now, with your "Masterplan," alternative access road that your people find most desirable, you are threatening our very existence for what appears to be your benefit, certainly not ours. After attending several meetings as well as reviewing the DEIR, I wish the following concerns to be addressed, although I will not cite all the direct points and paragraphs:

1. FACULTY/STAFF: I would like to see, in writing, in the final EIR the assurances or covenants that limit, now and in the future, the buildings' occupants to faculty and staff, with no conversion to students.
2. NOISE/TRAFFIC: We already hear all the partying done by students above the freeway, as that noise carries. Now you want us to put up with additional noise from increased traffic traveling to and from the Del Cerro area through our private streets. Once opened, it would be impossible to limit that traffic to those

-I-15-1

-I-15-2

-I-15-3

<p>homes you are building, although that in itself would be too much. Many will use it as a throughway to avoid the other busy routes We occasionally have had SDSU folks leasing the few rental units that exist in our area, and they have multiple occupants in order to pay the rent, each has a car, each has several friends that come and go, the noise, disrespect for our residents, property and rules has already been very disconcerting.</p>	<p>I-15-3 Cont.</p>
<p>We do not have sidewalks, our streets are just wide enough for fire codes, backed up by a high hillside to Allied Gardens on one end, and the flood channel and hillside to the freeway on the other. Our residents drive and walk on these streets, our pets are on these streets and our mailboxes have to have residents walking these streets to access mail. We cannot accommodate the number of ADT's you stated we could. Trash pickup is along these streets, blocking a lane while picking up. This applies as well to mail delivery, repair trucks, moving vans, maintenance vehicles, emergency vehicles, etc. We are responsible for safety, traffic, repairs, maintenance of the roads, which are private. We are a small community and cannot afford nor accommodate any increased impact, and are unable to take on additional burdens.</p>	<p>I-15-4</p>
<p>The students who rent along the Waring Road end of Adobe Falls are frequently disrespectful of the traffic, double parking while they chat with a friend, giving the "finger" (or worse) to anyone who says anything, leaving their car doors open to the traffic lane on an already very narrow road. Do we have to look forward to more of this behavior from your campus? The western end of Adobe Falls Road is also a narrow, highly dense parking and traveling area now for the community. The policing of this road has already created problems. To think of your adding additional traffic through this road at any point is unacceptable for its conditions.</p>	<p>I-15-5</p>
<p>The ratings in your EIR are inaccurate and unsafe, and will make this only egress/ingress a further nightmare, especially in any emergency. There is already a 100+ unit building being erected at the western end, and the construction, as well as future traffic issues, are difficult and have already slowed everything up. This has not been addressed in your EIR either.</p>	<p>I-15-6</p>
<p>3. INFRASTRUCTURE: You say you will do your fair share of contributing money to the city for the infrastructure. I would request that be guaranteed before any building starts. Would it be <i>done</i> in advance of the building and occupancy if this were to go through? Would it be truly adequate? Would it be safe, and not go through Smoke Tree Adobe Falls property, or through the narrow and very busy Adobe Falls Road leading to Waring and/or the bridge to the trolley stop? If you do not have the funds earmarked specifically for the infrastructure as each phase is to be constructed, it should not be started. This is unfair to the people in the immediate and surrounding areas as they have to put up with unmitigated problems and double construction issues.</p>	<p>I-15-7</p>
<p>Why isn't a traffic and pedestrian entrance/exit off the freeway or bridge specifically to and from the campus on either side of the freeway not being built, especially if you state no more campuses are allowed to be built, so this is going to continue to be a problem well into the future, not just now?</p>	<p>I-15-8</p>
<p>4. ENVIRONMENT: Hummingbird nesting as well as well known and documented plants and other birds like the gnatcatcher. Air quality reduction from the major</p>	<p>I-15-9</p>

increase d/t auto emissions and pollution, let alone the trash thrown out by the additional careless drivers. We have already had fires started by drivers on the freeway throwing cigarettes/matches down on us.	I-15-9 Cont.
5. ROADS: Increased car usage breaking down a road built for much less traffic, breakdowns of cars on narrow roads impeding traffic and safety	I-15-10
6. HILLSIDE IMPACTS: What would the increased noise, pollution, vibrations, etc do to either the hillside supporting I-8 West, or the hillside north of our association supporting the homes above us?	I-15-11
What will be the impact of your changing the structure and land in the proposed campus area on the runoff water onto the small riverbed, flood channels, and ultimately onto our homes re possible flooding?	I-15-12
7. CRIME: Increased traffic, density, and openness will bring increased crime to our already difficult situation from the west end of Adobe Falls Road.	I-15-13
8. H2O and SEWER SYSTEM: The city has had a problem with the sewer system that drains a long Adobe Falls for a long time, and have been unable to follow through on their plans to repair the sewer system due to funding. Now they are disputing that these are private sewers and our responsibility to repair. Will your additional buildings increase the amount of sewer flow into our sewers, that if deemed private we will have to pay for? What will be your contribution to the mitigation of that issue? How do you propose to handle that or help the city handle that? You are also increasing the vast water usage and problems we have in this area with that increase in density.	I-15-14
9. REALITY OF PLAN FOR FACULTY/Staff: Having polled a few of your current and retired faculty re living alongside students, they adamantly stated they would have NO interest in living there! If your faculty/staff do not fully utilize the housing, would you leave it empty or bring in others to fill the spaces?	I-15-15
Who would police the activity, noise, trash etc? Your security people? I have seen how that has failed in the past, and the local police already have their plates full. The city is already asking them to work harder for less money. We had a fire in that area 2 years ago, probably due to carelessness, that threatened all of our homes on both sides of Adobe Falls.	I-15-16
10. RESIDENTIAL CONSISTENCY: We are individually owned nice single family condominiums, with many older members who need to live and drive in a quiet and safe, slow moving environment. How will your increase in density, multiple occupation and use buildings be consistent with the existing residential area? It isn't.	I-15-17
While I do appreciate the fact that some things have changed in a positive direction, I do not see enough thoughtfulness and attention to accurate detail to bring back any trust I may have had in the past toward SDSU in regards to being an honest and good neighbor. Please, prove me wrong and live up to the idealism once attributed to education and universities.	I-15-18

Sincerely,



July 16, 2007

Armin and Rhea Kuhlman
5069 Catocin Drive
San Diego, CA 92115

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JUL 23 2007

Facilities Planning, Design
and Construction

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Dear Mr. Fulton,

We believe that the draft EIR for the San Diego State University Master Plan is inadequate and requires revision for a variety of reasons, some of which are enumerated below:

1. Inflated Assumptions of Projected Demand

According to the EIR, SANDAG projects a 32% increase in San Diego County population for the years 2004 - 2030. (Table 3.12-1, attached). This equates to a projected annual growth rate of 1.2% per year. Yet SDSU is proposing an increase from 25,000 to 35,000 FTES for the same period, an increase of 40%, or 1.7% per year through 2030. The EIR justifies this projected growth in FTES in excess of County population growth rates with vague references to the belief that "more people will seek access to higher education" in the future. Yet it fails to provide any documentation to that effect. While it is undoubtedly true that more people will need access to higher education, the rising costs of such education, coupled with the declining availability of financial aid, may well preclude any proportional increase in demand.

I-16-1

SDSU staff have orally referred to the increase in the number of applications received in recent years as evidence of increasing demand. Increased applications do not provide evidence of increased demand so much as evidence that recent college applicants are each applying to many more schools, as "backup insurance". The "multiple application" phenomenon has been well documented, and should come as no surprise to the sophisticated planning staff at SDSU, yet they fail to account for this trend in their analysis of the increased applicants. What percentage of students accepted for admission at SDSU, for example, actually matriculate? How many attend for enough time to obtain a degree? Absent solid evidence for a 40% increase in demand in San Diego County, SDSU growth projections should be scaled back to a maximum of 32%.

I-16-2

We suspect that even this 32% growth figure is inflated, since it is based on SANDAG 2004 projections. It has become evident in recent years that the growth rate in California,

I-16-3

and in San Diego County, has slowed in the last decade, due in part to the lack of adequate low cost housing. (Steve Lawrence, ASSOCIATED PRESS, May 1, 2007, quoting Linda Gage, senior demographer, California Department of Finance). While counties such as Riverside and San Bernardino are anticipated to experience explosive growth (200 - 300%) in the coming decades, this is not true of the San Diego region. Last year in San Diego, in fact, more people actually moved out of the region than moved in. Is this trend accounted for in SDSU's projections? In light of the state's limited resources for higher education, it would seem prudent for institutions in slower growth regions such as San Diego to be conservative in their FTES demand projections, rather than inflating them.

I-16-3
Cont.

Finally, even if the 40% enrollment demand projection is justified, there are other ways to meet this demand, rather than expanding the main campus. SDSU's FTES enrollment is already at the historic maximum for Cal State campuses, 25,000 FTES. There were good reasons for this maximum, one of which was to avoid unduly impacting the immediately surrounding area. The College Area is already impacted by SDSU, which is recognized in this report. **Yet a sizable number of SDSU students are from outside the SDSU service area (San Diego County and Imperial County).** According to the analysis in Appendix O of this EIR, in 1998 and 1999, **about half (49% and 47%, respectively) of the student body came from outside the service area.** Before it further impacts this immediate area, SDSU should **change its admissions policy to substantially reduce the proportion of students it serves from outside the service area**, so that it can accommodate the students who live here. Such a reduction would substantially diminish, if not eliminate entirely, the projected demand for a 40% increase in enrollment. It could also serve to limit the demand for student housing, since more students could live at home.

I-16-4

2. Disregard for Location of Projected Population Growth Within San Diego County

Attention should be given to the areas in which San Diego population growth is anticipated to occur. Although the San Diego region is projected to grow by 32%, Table 3.12-1 shows that much of that growth will be in outlying areas of the county: 55% in the unincorporated areas, 52% in Chula Vista, 43% in San Marcos, etc. Of the 971,739 additional people expected to live in San Diego County in 2030, only 361,110 of them (37%) will live in the City of San Diego. Another 36,770 will live in the relatively "close in" suburbs of La Mesa (8515), Lemon Grove (5585), Coronado (4447) and National City (18,223). The rest of the new growth, however (573,859, or 59%) will be in the unincorporated areas or outlying cities of North County, South County, and East County.

I-16-5

Would it not make more logistical and ecological sense to partner with existing community colleges in these areas, and build joint use facilities that could serve the growing populations where they will actually live? Does CalTrans really need students from San Marcos, Chula Vista and Santee (not to mention Temeculah and other southwest Riverside County cities), adding to the traffic load on our already strained freeways as they commute all the way to SDSU? Do we need the associated air pollution from such commutes?

In the Alternatives section of the EIR, Institutional Alternatives are discussed. It is laudable that SDSU's efforts in San Marcos resulted in the establishment of a state university there, and appropriate that **the lion's share of the growth in North County (and southwest Riverside County) should be absorbed by the San Marcos Campus,** which still has substantial growth potential.

Unfortunately, SDSU's minimal efforts in National City and Miramar College were discontinued in 2004, primarily due to lack of funding. It is suggested that, instead of pouring funding into the massive 40% growth project proposed with this EIR in an already impacted area, serious and adequately funded efforts in East and South County would result in the establishment of successful programs which would better serve the student populations in these rapidly growing areas. The EIR mentions that the National City program experienced insufficient demand. Since a significant portion of the projected growth in 2030 is in South County (esp. Chula Vista), is the EIR suggesting that this portion of the County will continue to generate insufficient demand in the future? If so, then the 40% demand projections can comfortably be reduced to disregard this segment of the population.

I-16-6

The EIR acknowledges that the proposed project would result in major and unmitigated impacts on traffic and air pollution in the College Area, yet fails to seriously consider alternatives which might actually mitigate such impacts, such as placing facilities on outlying campuses in areas where major growth is expected to occur. This oversight needs to be addressed.

3. Insufficient Analysis of Population Growth and Housing Supply and Demand in the College Area

CEQA Guidelines Appendix G provides that a project would have a potentially significant impact relative to population and housing if the project would: "a) Induce substantial population growth in an area, either directly ... or indirectly". The EIR acknowledges that "the proposed project would result in an increase in area population growth" (p. 3.12-12). It then goes on to conclude that there would be no significant impact on housing in the area. This is an absurd conclusion.

I-16-7

The EIR asserts that because of the state's increasing population (to which it attributes 72% of the growing demand) and the projected statewide higher education enrollment (to which it attributes 28% of the growing demand), "the proposed project is, fundamentally, growth accommodating and not growth inducing" (p. 3.12-13).

I-16-8

As discussed above, the EIR has not adequately documented the need for a 40% enrollment jump **at this location**, rendering the above statement questionable at best. It is clear that the proposed project would in fact be growth inducing for the College Area.

SANDAG population projections are utilized to "prove" that the proposed enrollment increase is "consistent with growth forecasts for the area." This is tautological reasoning

I-16-9

at its most dizzying. The EIR acknowledges that SDSU in 2005 provided SANDAG with its 40% FTES growth projections, and that SANDAG has presumably incorporated these figures into its own projections for San Diego population growth in its most recent update of its 2030 Forecast. Is it any surprise, then, that while SANDAG forecasts the population of the City of San Diego will increase by 28% by the year 2030, it projects that the population of the College Area will increase by a staggering 48%? Could this possibly be a coincidence? SANDAG's 48% growth projection for the College area proves only that somebody at SANDAG can read, not that growth plans are "consistent with (SANDAG'S) growth forecasts for the area."

I-16-9
Cont.

The same impressive logic is carried over to the housing analysis. In section 3.2.5.2 (p. 3.12-15) the EIR notes that, "The increase of 12,667 SDSU students, faculty, and staff by buildout year 2025 likely will necessitate additional housing units in the area." It then concludes that the housing impacts are not significant. The 2004 SDSU student housing demand study by Brailsford and Dunlavey is referenced to offer the not surprising conclusion that the majority of students are price sensitive, and prefer to live near school. The study showed that 33% of the current student population lived either on campus (16%), or within one mile of campus (17%).

Unfortunately, the 2004 study was deficient in two regards. First, it did not include in its estimate those students currently living in privately owned and managed multi-family units within one mile of campus, "thereby understating the number of students currently residing within one mile of campus" (p. 3.12-15). Secondly, it looked only at those students living in multi-family housing. It provided no data about those students living in single family housing, either that owned by absentee landlords or those crammed into the notorious "mini-dorms" of the College Area, which routinely house 6 - 12 students, or more. Without providing data on these two categories of student residents, the study would have seriously under-estimated the percentage of the SDSU student population living in the College Area. This oversight is exacerbated by the fact that there has been explosive growth in the mini-dorm population since 2004.

I-16-10

Without data on College Area mini-dorm residents and other single family housing residents, or those in privately owned/managed multi-family units, SDSU does not have an accurate estimate of students currently living in the College Area, and **therefore cannot accurately project future housing demand in the College Area under the 40% growth scenario.** It seems very likely that 33% is a substantial underestimate of the proportion of SDSU students living in the College Area.

The 2004 study seems to assume that any currently existing privately owned/managed multi-family housing will still be here in 2030, so any proportion of the student population currently living in this housing can safely be disregarded. This is not a valid assumption. Much of the privately owned/managed multifamily housing is aging stock. Maintenance problems may well result in demolition, or renovation for condo conversion. The economic pressure for condo conversions has temporarily eased off, but this easing is temporary at best. If demolitions or condo conversions occur, they will displace the uncouned students living in this housing into other housing in the College

I-16-11

area, most likely the single family housing. This would create a significant impact.

I-16-11
Cont.

With regard to students currently living in single family housing, and especially in mini-dorms, this is an inappropriate and unacceptable solution to SDSU's housing problem, which has already heavily impacted the neighborhood. The University needs to accept responsibility for this problem instead of passing it off as a City of San Diego issue (as it does in this report), and to remedy its current undersupply of student housing before it proposes future growth..

I-16-12

Further, the EIR's assertion that future campus and privately developed housing stock within 1 mile of campus will provide for 50% of housing demand is unjustified. Even if the 33% figure is assumed to be accurate, the proposed project offers only an additional 1976 units of on-campus housing, plus 215 units of SDSU-managed housing on Sorority Row. Of the 11,385 additional students who would be enrolled under the 40% increase scenario, 3757 would require housing on or near campus, based on the (admittedly understated) 33% figure. The EIR blithely assumes that the rest of the demand would be met through private development. Unfortunately, private development is never a sure thing, as SDSU's own experience through the SDSU Foundation has made painfully evident over the last 20 years. Private development is subject to the availability of financing, not to mention the economics of supply and demand. If building costs increase substantially, as they have in recent years, there is no guarantee that any private developments currently on the drawing boards can be offered at a rate affordable to SDSU's "price sensitive" students.

I-16-13

As its chronic under-supply of campus housing demonstrates, SDSU does not have an admirable track record as a good neighbor or a responsible corporate citizen. It's current undersupply has already caused the current mini-dorm and absentee landlord crisis in the single family neighborhoods of the College Area. The pending EIR offers SDSU a golden opportunity to remedy its past omissions by proposing an adequate amount of on campus or SDSU managed housing. It would be grossly irresponsible to depend on the private sector to fill the gap and provide the requisite housing for SDSU's projected growth.

If SDSU proposes to grow by 40%, it should, at a minimum, provide on-campus or SDSU-managed housing for 33% of the projected 11,385 new student beds needed as a result of its growth, or 3757 new beds. If the projected private development does materialize, it can absorb some of the demand currently met by single family residences throughout the College Area, and thereby relieve an intolerable situation which is destroying the neighborhood. If the private development does not materialize, at least the neighborhood's single family housing supply will not be further impacted.

I-16-14

To assert, however, that the minimal amount of SDSU developed housing proposed in this plan would result in a "no significant impact" finding in the face of a 40% enrollment jump, is absurd.

The EIR notes that SDSU has commissioned a subsequent housing demand and market

I-16-15

study, and that this study is scheduled for release in the Fall of 2007. It does not indicate whether the updated study will compensate for the deficiencies of the 2004 report by examining student residence in single-family mini-dorms and privately owned/managed multi-family units in the College Area. At any rate, the point would be moot, since SDSU proposes to finalize the EIR prior to the release of the updated study.

It is strongly urged that the comment period for the EIR be extended until the updated housing demand and market study is released, and that the study include data on student residents in College Area mini-dorms and privately owned/managed multi-family housing. At a recent meeting of the College Area Community Council, SDSU staff indicated that even the updated study would not include this missing data, because it is (for some unstated reason) "difficult to obtain". Presumably, SDSU's student registration information contains addresses of all registered students. Are we to believe that SDSU is incapable of running a zip code scan? For an institution that touts itself as the "best small research institution in the United States", this assertion strains credulity. No analysis of housing demand and markets in the College Area can be considered adequate until this data is made available, and SDSU should delay finalization of the EIR until it is obtained.

I-16-15
Cont.

4. Disregard for Significant Unmitigated Traffic and Air Quality Impacts, and Failure to Address Traffic Impacts to Outlying San Diego County Freeways

As long time College area residents, we have serious concerns about the major adverse impact of the SDSU expansion project on traffic and congestion in our neighborhood and freeways. After studying the Section 13-14 Traffic Parking and Circulation in the SDSU Master Plan, we have questions in the following areas: (1) trolley ridership assumptions, (2) projections for net increases in average daily trips (3) significant impacts on major roads and intersections and (4) uncertain funding for mitigation measures.

I-16-16

By 2012/13, the EIR assumes that 32% of enrolled students will live on campus or within .5 miles of campus. Then by 2024/25, the study projects that 40% of students may live in the same area because of the possible greater availability of housing. You assume 70% of the students will be commuters by 2012/13 and 65% by 2024/25. Where is information on the number of students who live from .5 miles to 1-2 miles from campus and their traffic (and parking) impact? This data is essential for a more realistic assessment, and to make the study consistent with the housing analysis.

According to the EIR, 4726 students, faculty and staff are currently taking the trolley to and from campus. By 2012, SANDAG projects 6669 riders and by 2024/25, 11624 riders. However, much of the projected County growth is in areas which the trolley does not currently serve, which throws into question the basis for these projections. (For example, projected population growth in the City of San Diego is only 28%, but trolley ridership more than doubles.) We question that if these optimistic assumptions are not met, then the projected level of vehicle trips will be understated. The reasons for these optimistic figures are not discussed. Furthermore, why aren't incentive programs for riding the

I-16-17

trolley or bus, carpooling and shuttles from outlying parking areas such as Qualcomm stadium discussed?	I-16-17 Cont.
If much of the growth in San Diego County is expected to be in the Chula Vista and North county communities, you should include analysis of the impact to freeways in outlying areas of the County as a result of additional commuting to SDSU from these areas. <u>This glaring omission needs to be addressed.</u>	I-16-18
Please consider other alternative locations for satellite campuses in Chula Vista and East County, and expand San Marcos to better accommodate San Diego County population growth patterns. The EIR does not adequately address the feasibility of new satellite campuses in less densely built up areas than SDSU's current neighborhood, with respect to traffic impacts.	I-16-19
Both the Near-Term and Horizon Year Project Analysis show the addition of project traffic would result in significant impacts at critical major intersections and roadway/street segments. It notes that these already operate at unacceptable levels of service without project conditions. If this is true, it is irresponsible public policy to advocate additional traffic to an already seriously congested area.	I-16-20
The Mitigation Measures assume that SDSU will be able to secure funding from the legislature for your fair share. As you know, there is a real risk that there may be delays or inadequate funding. However, the EIR also assumes that these mitigation measures will all be actually constructed and we all know that there is no assurance of this unlikely prospect given our already heavy infrastructure demands. This paints an unrealistic and misleading picture of mitigation measures outside your control that you can't assure or commit to.	I-16-21
Even if the proposed mitigation measures were implemented, the EIR notes significant and unavoidable impacts to critical points such as College Avenue/I-8 interchange, Montezuma Road (between Fairmont and Collwood Blvd.), Alvarado Road (between E. Campus Drive to 70 th Street) and I-8 (between Fairmont Avenue to Fletcher Parkway). Actually, your contribution to these serious traffic impacts is avoidable if you evaluate more responsible alternatives to meet SDSU enrollment growth plans. Be a Good Neighbor and limit your main campus expansion goals. Study other areas where the population is growing, to be closer to your students	I-16-22
5. Grossly Inadequate Consideration of Alternatives	
CEQA Guidelines, Section 15126.6, require the consideration of alternative project locations. Under "Project Alternatives", SDSU dismisses the idea of alternative locations, as follows: "Because the objectives of the proposed project are focused on facilities and improvements to the existing SDSU campus necessary to accommodate a projected 35,000 FTES enrollment, an alternative location ... would not meet one of the primary objectives of the project". This tautological statement fails to seriously consider that if there is, in fact, a need to accommodate 35,000 FTES (which we question), that need might better be accommodated in other, less impacted, locations.	I-16-23

The analysis further states that, "Relocation of the proposed academic facilities to another area merely would have the effect of shifting the traffic and air quality impacts to another location." As discussed above, this is not necessarily the case. If the facilities are placed where the major growth in San Diego County is anticipated to occur (in the unincorporated areas and the cities of North County, South County and East County), such facilities could actually mitigate the anticipated traffic and air quality impacts of the project.

I-16-24

Given the significant and unmitigated impacts any proposed growth in this location would have on traffic and air quality, we strongly urge that SDSU give serious consideration to alternative project locations, instead of brushing off this option as infeasible. SDSU staff has stated that the Board of Trustees of California State University has a policy limiting satellite locations to 500 FTES. But the Trustees have also had a policy limiting FTES at main campuses to 25,000. It appears, therefore, that these policies are not set in stone, and are subject to periodic re-examination, based on changing circumstances. In light of the severe impact the proposed project would have in this already impacted area, perhaps the Trustees would be open to re-examining the 500 maximum FTES policy. Unless SDSU explores this option, we'll never know.

I-16-25

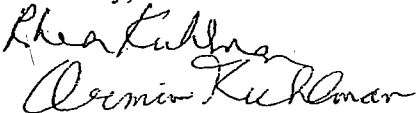
Finally, SDSU should consider an alternative which was not even raised in this draft EIR: adjusting its admissions policy to reduce the number of students from outside its service area, thereby freeing up capacity to serve a higher proportion of residents of San Diego County (other than North County) and Imperial County.

I-16-26

We recognize that SDSU, like all California State campuses, must plan for future population growth. Every eligible California student should have access to higher education. However, unless SDSU can better justify the need for a 40% jump in enrollment on its main campus, it appears that either the No Project or the 5,000 FTES alternative would be a more appropriate goal.

I-16-27

Sincerely,



Armin and Rhea Kuhlman

(619)582-1962, finebks2@sbcglobal.net

Cc: Lauren Cooper, Associate Director of Facilities Planning, Design and Construction
College Area Community Council, Attn: Doug Case, President
Councilman Jim Madaffer, City of San Diego
Mayor Jerry Sanders, City of San Diego
Mike Aguirre, City Attorney, City of San Diego
State Senator Christine Kehoe
State Representative Shirley Horton

**Table 3.12-1
SANDAG Regional Population Forecasts**

Local Jurisdiction	2004	2010	2020	2030	Total Increase (2004 to 2030)	% Change (2004 to 2030)
Carlsbad	92,695	109,611	119,095	127,046	34,351	37%
Chula Vista	208,675	248,174	289,304	316,445	107,770	52%
Coronado	26,591	27,512	29,738	31,038	4,447	17%
Del Mar	4,543	4,661	5,138	5,497	954	21%
El Cajon	97,670	100,919	105,214	112,008	14,338	15%
Encinitas	62,463	65,358	68,030	73,170	10,707	17%
Escondido	140,328	148,630	158,494	169,929	29,601	21%
Imperial Beach	27,799	28,331	32,590	36,125	8,326	30%
La Mesa	56,007	59,920	60,686	64,522	8,515	15%
Lemon Grove	25,590	27,163	28,859	31,175	5,585	22%
National City	56,018	59,905	69,104	74,241	18,223	33%
Oceanside	172,866	186,785	196,482	207,237	34,371	20%
Poway	50,534	51,833	54,035	57,474	6,940	14%
San Diego	1,295,147	1,365,130	1,514,336	1,656,257	361,110	28%
San Marcos	66,850	82,608	90,026	95,553	28,703	43%
Santee	54,084	62,031	66,668	72,115	18,031	33%
Solana Beach	13,396	13,807	14,839	15,761	2,365	18%
Vista	94,030	98,182	106,075	115,768	21,738	23%
Unincorporated	467,728	504,719	627,142	723,392	255,664	55%
Region	3,013,014	3,245,279	3,635,855	3,984,753	971,739	32%

Source: SANDAG 2006.

SANDAG interprets many economic and social trends and incorporates them into the regional growth forecast model to predict future population increases. Trends important to determining future population growth in the San Diego region include birth and death rates, domestic and international migration, and major economic indicators, including the opening of major new employment centers or a closure/expansion of a military base. Two important indicators in the regional model are specifically relevant to this analysis: total number of enrolled college

July 20, 2007

Anthony Fulton
Director of Department of Facilities Design
Planning & Construction Divisions of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92181-1624

Dear Mr. Fulton:

This letter comes in response to the environment impact report recently published by San Diego State University related to the Adobe Falls project that is being proposed. As residents of Adobe Falls Road we have concerns about the proposed plan and the negative impact it will have on the community. Specifically:

- There is no disclosure on the analysis that leads to the 1040 ADT referenced in Figure 8-4 related to additional traffic volume on Adobe Falls Road. Due to the extremely pitched slope any additional traffic poses significant risk to all residents.
 - o Response expected from SDSU: Full disclosure on the genesis of the 1040 ADT referenced in Figure 8-4 of the EIR. Additionally, a full analysis on the impacts to this specific street given the unique grading and resulting mitigation plans that SDSU plans to implement is critical.
- The levels of service (LOS) for residential streets are misrepresented in the EIR and falsely give a diminished sense of impact. The residential streets in San Diego do not fall under this classification and should be removed from the EIR. Further, the capacity representation for these residential streets is misrepresented at 1500 ADT, which results in the EIR falsely deflating the actual impact to the community. We do not see how a severely sloped cul de sac can be classified as anything other than a low volume residential street, which supports the capacity of 700 ADT.
 - o Response expected from SDSU: A removal of the LOS classification; a restatement of the actual capacity of local roadways; and most importantly a thorough analysis of the impact based on the magnitude of the proposed traffic volume increases, not LOS grades.
- The response to the disruption of the local habitat of plants and animals is to purchase uplands elsewhere. This is an illogical solution. A simple approach would be to maintain these lands and simply purchase more suitable building property.
- There is no reference to degradation of home values, specifically on Adobe Falls Road, upon the loss of living on a cul de sac, the addition of high-volume traffic on low capacity streets and being housed next to high-density condominiums.
 - o Response expected from SDSU: Acknowledgement of the negative impact this project has on local real estate owner investments.

Sincerely,


Paul Bragoli & Joyce Pepper

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JUL 23 2007

Facilities Planning, Design
and Construction

July 20, 2007

Cc:
Del Cerro Action Council
Governor Arnold Schwarzenegger
Leonard Bloom, Greater Centurion Corp.
Senator Dennis Hollingsworth
Senator Christine Kehoe
Assemblywoman Shirley Horton
Assemblywoman Lori Saldans
Assemblyman George Plescia
Country Supervisor Dianne Jacob
Councilmember Jim Madaffer
San Diego Unified School District Superintendent Carl Cohn

TIMOTHY G. TODD, ESQ.

6027 ADOBE FALLS ROAD
 SAN DIEGO, CALIFORNIA 92120-4626
 TEL: 619-582-5879
 FAX: 619-582-0586

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July 20, 2007

JUL 23 2007

Mr. Anthony Fulton, Director
 Department of Facilities Design, Planning & Construction
 Division of Business and Financial Affairs
 San Diego State University
 5500 Campanile Drive
 San Diego, CA 92182-1624

Facilities Planning, Design
 and Construction

Dear Mr. Fulton,

We write to express our concerns and questions with regard to SDSU's 2007 Campus Master Plan Revision EIR, particularly in connection with the Adobe Falls portion. While we appreciate the University's need for expansion and affordable faculty housing, we feel the following issues have not been adequately addressed in the plan:

- The EIR does not take into account the nature of Mill Peak Road and Adobe Falls Road in addressing traffic and safety impacts. These two roads flow into each other near the top of a very steep hill and appear to be one continuous street. Mill Peak Road/Adobe Falls Road is very steep, with blind, poorly banked curves. This is likely one of the steepest streets in San Diego and corkscrews down the hill in such a way that visibility is reduced to no more than 30 yards or so at various points. The surface of the street is rough and poor, perhaps in part as a function of erosion and water damage, which is extensive (in heavy rains, water rushes down the street in torrents). There have already been several accidents in which "runaway" vehicles have crashed into residential yards. Two of these incidents have occurred within about 100 feet of our home in recent years. Pets have been killed by vehicles that are speeding to gain momentum when going up the hill or speeding because of their inertial force (or otherwise) going down the hill. We are not personally aware of any child or other pedestrian killed or injured, but we believe the danger is certainly there, as cars on this street routinely are moving at higher speeds than we find more common once vehicles are traveling along the relatively flat top of the mesa and heading toward College Avenue. Adding a minimum of 1040 trips per day (as estimated in the EIR) on such a street to the 410 trips the EIR indicates is the current load we believe will constitute a significant hazard to residents and others using Mill Peak Road/Adobe Falls Road. This will more than triple (increasing by 3.5 times) the ADT on a street that was never designed for such a traffic load. We believe the EIR is deficient in this analysis and that SDSU should do a thorough analysis of safety issues and effects of the increased number of trips and indicate what steps will be taken to mitigate these traffic impacts.

I-18-1

- The EIR takes no account of the increased amount of traffic in the area that will result from putting in public trails and access to Adobe Falls. Adobe Falls is a unique and attractive hiking destination in San Diego County and will likely attract many day visitors, especially in the Spring when the falls are full and dramatic. This will generate an unaccounted-for level of additional vehicle traffic and parking problems, and we fear this will add even more to the traffic burden on Mill Peak Road/Adobe Falls Road. Failure to address this issue is a significant omission in the EIR.

— I-18-2
- As members of the Audubon Society, we are very concerned about the environmental impact of the proposed development. The area to be developed is one of few open spaces left in this area, and development will disturb/wipe out important habitat of many local species, including the federally protected Least Bell's Vireo and California gnatcatcher and our dwindling population of "tree" foxes.

— I-18-3
- The level of service ratings described in the EIR for Adobe Falls Road and surrounding streets are erroneous. We understand that our residential streets currently have no LOS ratings. Since SDSU proposes traffic volume increases of more than 100% on these streets, it must conduct an impact analysis of the adverse effects on residences, pedestrians, bicyclists, and pets. Further, we believe SDSU has misclassified the streets as having a 1500 ADT capacity, when in reality we understand that they should be classified as Low Volume Residential Local Streets, with a capacity of 700 ADT per day. Whatever the classification of other streets, however, we believe the Mill Peak Road/Adobe Falls Road street that runs off the top of the mesa to the bottom of the hill cannot be reasonably classified as anything but a Low Volume Residential Local Street. We believe that even 700 cars a day would tax the safety capacity of this steep and winding street.

— I-18-4
- Most significantly, the EIR acknowledges that Del Cerro Blvd.'s maximum capacity is 5000 ADT (as set forth in the Navajo Community Plan) and that, furthermore, that capacity is already being exceeded by 170 additional daily trips. Therefore, any additional traffic on Del Cerro Blvd. constitutes a significant adverse impact (on both residents and children attending Phoebe Hearst and the Temple schools), and merely reducing the number of proposed homes (while increasing the number of trips by more than 1400 per day at minimum) cannot properly be considered "mitigation" under the law. Construction plans must avoid causing any additional traffic on Del Cerro Blvd.

— I-18-5
- The intersection of Del Cerro Blvd. and College Avenue is already egregiously crowded at rush hours, and additional traffic poses safety hazards and unacceptable delays that will not be mitigated by the addition of an extra right turning lane from Del Cerro Blvd. to College Avenue. Also, no consideration is given to the left turn lane from College Avenue to Del Cerro Boulevard. Traffic

— I-18-6

already backs up at the left turn lane during the evening rush hour period, and longer lines of traffic will snake back down College Avenue into a blind curve which is dangerous because oncoming vehicles cannot see vehicles that are stopped to turn left. We found no discussion of this problem in the EIR.

I-18-6
Cont.

- The nature of traffic reduction achieved by the proposed shuttle is speculative and has not been fully documented or addressed.

I-18-7

- We believe that a viable alternative that would allow SDSU to build out all of its proposed units for its faculty and staff and to eliminate all of the traffic impacts discussed above is suggested by Alternative 2 in Figure 5.0-2 of EIR. As proposed, this would connect the eastern-most units directly to College Avenue. If this alternative were to be extended west it could provide direct access to all of the homes proposed in the western area (the lower area) as well. This would provide direct and exclusive access to College Avenue to all of the residents of SDSU's faculty and staff housing and would eliminate the need to connect the development to either Mill Peak Road directly at the top or to Adobe Falls Road at the bottom. SDSU's faculty and staff would simply turn right at the stop light to access the I-8 freeway or the campus, or turn left to proceed north on College Avenue to grocery markets and other services. It would also open the possibility of adding more units if SDSU so desires because there would be no impact on already crowded local roads in the Del Cerro neighborhood.

I-18-8

We understood from the comments of an SDSU representative at a local neighborhood meeting at which the EIR was discussed that an objection to many of the alternatives examined in the EIR and illustrated at Figure 5.0-2 is that they add costs which, when added to the other building costs and spread over the number of units proposed, would require pricing the homes above what professors and staff can currently afford. While accounting for the full cost of infrastructure in the sales price of the townhomes would certainly make sense if SDSU were a typical developer selling out its development with no further ownership involvement, we understand that SDSU intends to retain ownership of the land and the right (and possibly the obligation) to repurchase the townhomes and to resell them repeatedly to faculty and staff in the future. The SDSU representative said the expectation is that the homes would be repurchased and resold by SDSU over at least the next 100 years and that the homes would become much more valuable over time to SDSU as a recruiting tool as homes in the surrounding San Diego area continue to appreciate in value while SDSU's cost basis will remain essentially fixed at its current costs. In this environment, insisting that all costs of access to the development must be priced into the current sales price of each townhome makes no sense. The development cost should be amortized over the expected life of SDSU's repeated future sales and can be included in increments throughout the useful life of the project to SDSU. If this is done, the cost of constructing adequate access to the units will be seen to be very manageable.

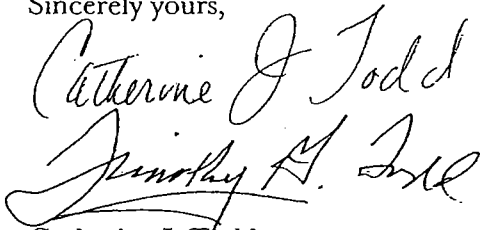
I-18-9

We want to emphasize that we value and support the mission of SDSU particularly and of the California college and university systems generally. We understand the need to provide housing opportunities to attract faculty and staff of SDSU and we would understand that need even if SDSU were not expanding. We believe that SDSU, however, must address through the EIR and its proposed mitigation plans the true impacts of its development proposals. The existing infrastructure was not built to sustain or intended to accommodate the scores of townhouses that SDSU proposes to build. With a dedicated access artery into the SDSU development, we believe the traffic issues would be solved.

I-18-10

We hope you can provide clarification regarding these issues and concerns.

Sincerely yours,

The block contains two handwritten signatures in cursive. The first signature is "Catherine J. Todd" and the second signature is "Timothy G. Todd".

Catherine J. Todd
Timothy G. Todd

Copies to:
Mr. Leonard Bloom
Governor Arnold Schwarzenegger
Senator Christine Kehoe
Assemblywoman Shirley Horton
County Supervisor Dianne Jacob
Councilmember Jim Madaffer
Katherine Nakamura

July 20, 2007

To: Ms. Lauren Cooper
Associate Director
Department of Facilities Planning, Design and Construction
Administration Building, Room 130
San Diego State University
5500 Campanile Drive
San Diego, CA 92182—1624

Dear Ms. Cooper,

After reading the Draft EIR, I have the following concerns regarding the Faculty/ Staff Housing proposed in Adobe Falls.

Please give us your assurance that the buildings in Adobe Falls will house only faculty and staff and will never be converted to student housing in the future. We would like this assurance in the final EIR and in the covenants.

I-19-1

As far as accessing Smoke Tree's private driveways in the second phase, I am opposed to that notion for the following reasons:

All of the Smoke Tree roads are designated fire lanes. We do not have curbside parking or sidewalks. These fire lanes are approximately 22 feet wide and cannot accommodate 1,500 more ADTs. The roadway classification in the EIR is erroneous. Our physical safety and that of our pets would be impaired if 1,500 ADTs were added because we have no sidewalks nor any place to pull over. We must either drive or walk to one of three community mailboxes because the Post Office will not deliver mail to individual units. With 1,500 more ADTs planned, we will not be able to do this safely. Mail delivery, trash pickup, moving vans, repair trucks, appliance deliveries, street light maintenance, and emergency vehicles would basically stop any traffic flow as there would not be sufficient space to go around them if 1,500 ADTs were added.

I-19-2

Our fire lanes are privately funded and we simply cannot afford to repave more often than we already do for our own traffic needs.

I also disagree that the western side of Adobe Falls Road can handle 6,500 ADTs when it is not as wide as Del Cerro Blvd. Which you are rating as the same two lane collector capacity roadway. You are rating Del Cerro Blvd. To have a maximum desirable capacity at 5,000 ADTs, "LOS C". Yet you are rating the western side of Adobe Falls Road with a higher capacity at "LOS D" to get the numbers to work to build more units. We request the same consideration for the west side of Adobe Falls Road. Additionally, your existing traffic numbers will need to be updated by the Levanto condominium project currently under construction. There is also a proposal for 50 more apartments on the North side of Western Adobe Falls Road too.

I-19-3

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JUL -23 2007

I object to the additional particulate matter and visual quality deterioration that would ensue from building a bridge over the flood control channel in Smoke Tree.

I-19-4

I also want your assurance, before the lower Village is constructed, that we in Smoke Tree are assured that the development will not cause the rain runoff to be more than the flood channel can bear.

I-19-5

Sincerely,



Ann Gottschalk
Board Member of Smoke Tree Adobe Falls
Homeowners Association
5717A Adobe Falls Road
San Diego CA 92120

Carol R. Kushner
5639 Meredith Avenue
San Diego, CA 92120
July 20, 2007

RECEIVED

JUL 23 2007

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Facilities Planning, Design
and Construction

Dear Mr. Fulton:

As a Del Cerro resident and community member, I wish to express several objections to the Environmental Impact Report (EIR) for San Diego State University's Master Plan regarding the proposed development of Adobe Falls. Following are issues of concern:

SDSU has misclassified our neighborhood streets: The EIR states they have a capacity of 1500 average daily trips (ADT). However, Del Cerro residents and I agree that streets including Arno, Genoa, Capri, Adobe Falls Road, Rockhurst, and Lambda are Low Volume Residential Local Streets, with a capacity of only 700 ADT per day.

I-20-1

The EIR invents levels of service (LOS) for our residential streets and claims these are found in the San Diego Roadway Classification Manual and LOS Table. This is *not* true. Residential streets have no LOS rating because their primary purpose is to serve abutting lots and not to carry through-traffic from one place to another. These LOS levels are fictitious and should be removed from the EIR. Del Cerro residents and I demand that SDSU conduct an impacts analysis based on the percentage or magnitude of the increase in traffic volumes of these streets as they propose increases of more than 100 percent. This constitutes a significant adverse impact to local residents, pedestrians, and bicyclists.

I-20-2

The EIR acknowledges Del Cerro Blvd's maximum desirable capacity, per the Navajo Community Plan, is 5,000 ADT. It also acknowledges Del Cerro Blvd is currently operating past that capacity by 170 ADT. SDSU *must* acknowledge that *any* amount of additional traffic on Del Cerro Blvd constitutes a significant adverse impact that must be mitigated or avoided: This is the only means of access and egress to the homes west of College Avenue; additionally, it has an adverse impact on the safety of residents and also schoolchildren who attend the schools at Phoebe Hearst and Temple Emanu-El.

I-20-3


Last, The EIR never fully acknowledges the full amount of traffic to be generated by the project. Instead, it reduces the amount by 10 percent, claiming a shuttle service would be introduced that will reduce the project traffic by that amount. Yet, SDSU never provides any evidentiary basis for this 10 percent number. Del Cerro residents and I demand that SDSU disclose the full amount of projected traffic increases, without any decrease for alleged shuttle service, until such time as they can provide evidence that a shuttle service will decrease traffic in any specified percentage.

I-20-4

These are some among many other objections to the EIR that I and other Del Cerro residents would like addressed.

I-20-4
Cont.

Sincerely,



Carol R. Kushner

cc: Leonard Bloom; Jim Madaffer

I-21

San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Dear Ms. Cooper:

After reading the Draft EIR, I have the following concerns regarding the Faculty/Staff Housing Project proposed in Adobe Falls.

Please give us your assurance that the buildings in Adobe Falls will house only faculty and staff and will never be converted to student housing in the future. We would like this assurance in the final EIR and in the covenants.

As far as accessing Smoke Tree's private driveways in the second phase, I am opposed to that notion for the following reasons:

All of the Smoke Tree roads are designated firelanes, we do not have curbside parking or sidewalks. These firelanes are approximately 22 feet wide and cannot accommodate 1,500 more ADTs. The roadway classification in the EIR is erroneous. Our physical safety and that of our pets would be impaired if 1,500 ADTs were added because we have no sidewalks nor any place to pull over. We must either drive or walk to one of 3 community mailboxes because the Post Office will not deliver mail to individual units. With 1,500 more ADTs planned, we will not be able to do this safely. Mail delivery, trash pickup, moving vans, repair trucks, appliance deliverers, streetlight maintenance, and emergency vehicles would basically stop any traffic flow as there would not be sufficient space to go around them if 1,500 ADTs were added.

Our firelanes are privately funded and we simply cannot afford to repave more often than we already do for our own traffic needs.

I also disagree that the western side of Adobe Falls Road can handle 6,500 ADTs when it is not as wide as Del Cerro Blvd which you are rating as the same 2-lane collector capacity roadway. You are rating Del Cerro Blvd to have a maximum desirable capacity at 5,000 ADTs, "LOS C". Yet you are rating the western side of Adobe Falls Road with a higher capacity at "LOS D" to get the numbers to work to build more units. We request the same consideration for the west side of Adobe Falls Road. Additionally, your existing traffic numbers will need to be updated by the Levanto condominium project currently under construction. There is also a proposal for 50 more apartments on the North side of western Adobe Falls Road too.

I object to the additional particulate matter and visual quality deterioration that would ensue from building a bridge over the flood control channel in Smoke Tree.

I also want your assurance, before the Lower Village is constructed, that we in Smoke Tree are assured that the development will not cause the rain runoff to be more than the flood channel can bear.

Sincerely,

Name and Address

John S. DeBelle
5691 B Adobe Falls Rd
San Diego, CA 92120
San Diego State Alumni
Smoke Tree

Patricia Pomeroy Ross SD State alumna
5691-B-Adobe Falls Rd
San Diego, CA 92120

P.S. The Waring family did not intend that the "falls" be destroyed when said property was donated!!

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JUL 24 2007
Facilities Planning, Design
and Construction

I-21-1

I-21-2

I-21-3

I-21-4

I-21-5

45-46

July 18, 2007

Lauren Cooper
Assoc. Director, Dept. of Facilities Planning, Design, and Construction
Administration Building Room 130
San Diego State University
5500 Campanile Drive
San Diego, Ca 92182


To Whom It May Concern:

We don't want the buildings to be built in Del Cerro because of the traffic problem that will ensue. The traffic in Del Cerro is at a maximum flowing safe capability now. Where are you addressing egress and ingress; i.e, traffic problems generated by long line traffic waiting?

San Diego State is so large now; it seems to us that perhaps it is time to start another campus in south or north counties. The campus is outgrowing its britches in the college area.

Ensuing increased traffic to an already heavy traffic area will cause massive tie ups and accidents which will be most detrimental in the end, both to the home owners, students, and renters resulting in many legal losses due to the egress & ingress.

Yours truly,


Mr. & Mrs. Morton B. Hirshman
5855 Madra Ave
San Diego, Ca 92120
619-583-7804

I-22-1

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JUL 25 2007

Facilities Planning, Design
and Construction

July 20, 2007

Anthony Fulton, Director
 Dept. Of Facilities Design, Planning and Construction
 Division of Business and Financial Affairs
 San Diego State University
 5500 Campanile Dr.
 San Diego, CA 92182-1624

RECEIVED
 JUL 25
 Facilities Planning, Design
 and Construction

Dear Mr. Fulton:

I have read SDSU's most recent Master Plan EIR and although I can appreciate efforts you have made moderating some of the outfall that would result from your original plan, you have shown continued disregard for the Navajo Community as a whole. Although I would like to address shortcomings in other elements of the Master Plan, I am most passionate about and will only address at this time, the Adobe Falls Project.

I-23-1

Below are my concerns regarding the Adobe Falls element of your Master Plan. Please address these prior to the issuance of your final EIR.

- I. SDSU classified several residential streets in Del Cerro as "residential" or "commuter", allowing a maximum ADT of 1500. These classifications were interpreted by the engineering firm hired by SDSU. It would seem absolutely necessary that SDSU classify these currently low volume residential streets as "residential" or "commuter" to justify the level of traffic that the Adobe Falls housing project will generate. However, the EIR provides no specific reasons why these streets were classified as they were. Adobe Falls Rd., Arno Dr., Genoa, Helena, Lambda and Rockhurst, currently have extremely low traffic volumes. They are all neighborhoods where typically senior citizens and families with young children are prevalent. If these are not the quintessential "low volume residential" streets, then what is? Additionally, Adobe Falls Rd., with a current ADT of 410 (according to your EIR) has a grade of approximately 17%, and is one of the steepest hills in San Diego County. Driving this street either up or down, warrants extreme caution. In addition, this street runs generally east to west, with the setting sun limiting visibility several days of the year. The categorization of Adobe Falls Rd., as anything but a low volume residential street, limiting traffic to 700 ADT, seems erroneous at best. Therefore, one must conclude that the categorizations of all of the residential streets in Del Cerro by SDSU, are erroneous and self serving.

I-23-2

I insist that SDSU provide data backing up the categorization of all streets in Del Cerro that are not already specifically categorized by the City or the Navajo Community Plan.

- II. Several low volume residential streets in Del Cerro will see ADT increases of from 250% to 400%, as a result of the traffic generated by the Adobe Falls Housing projects. These in no simple terms, are significant impacts and must be further analyzed. Even if one assumed SDSU's street classifications are justified, they are introducing significantly more traffic to an area where many people are out walking, children play, bicycles and scooters are present, etc..

I-23-3

Therefore, I request that SDSU conduct an impact analysis for all residential streets where potential traffic increases are more than 100%.

- III. The lower Adobe Falls development will contain attractions that will generate traffic flow from the general public. SDSU never addresses the potential amount and impacts of this traffic.

I-23-4

Therefore, SDSU must include an analysis of the potential traffic impacts generated by non-residential public to/from both Adobe Falls housing developments.

- IV. According to your traffic analysis, Del Cerro Blvd., is already operating past it's capacity of 5000 ADT, assuming the categorization of "commuter" is correct. Any additional traffic generated by the Adobe Falls project will further degrade the safety of this residential street, especially considering most of the traffic converges in a school zone.

SDSU MUST mitigate this! Del Cerro Blvd., cannot handle any more traffic. It is a dangerous street most of the year in front of Hearst Elementary school. Despite ALL attempts to make the crossing zones safer, it is still extremely dangerous at the intersection of Del Cerro Blvd., and Capri. I for one, have yanked a child back onto the sidewalk because a speeding vehicle runs through the cross walk. You can place signs, caution individuals and send a police car once in a while...It doesn't matter! A tragedy will most likely occur here, it's a matter of time. SDSU must not add to this, and if you press forward despite all warnings to the contrary, your mitigation measures must not simply look good on paper, but they must be effective from a practical sense.

I-23-5

- V. SDSU claims shuttle service will significantly reduce traffic generated by the entire Master Plan project. SDSU has NEVER provided evidence to that affect. In fact, I have personally noted the low ridership every time I see a Red and Black shuttle drive by, especially during the busiest times of the day.

I-23-6

SDSU must provide evidence that shuttle service will reduce traffic impacts around the university and beyond. Included should be current ridership as a percentage of overall ADT on each route. SDSU should must also be required to somehow test shuttle programs and providing results, before being able to use shuttle service as a mitigating factor.

VI. According to housing data tables in the population sections of the EIR, a relatively low percentage of SDSU faculty/staff live within a mile of the university. In fact, according to table 3.12-6, approx. 60% of the current F/S population live in areas not evaluated by the study. Potentially 348 units are proposed for the Del Cerro area. This will provide housing for 27% of the proposed 1282 faculty/staff increase. Whether or not the current F/S population or future populations inhabit the units at Adobe Falls, SDSU fails to quantify the number of units proposed. Additionally, SDSU continuously refers to a 2004 housing study, however information from this study has been omitted from the EIR. The need for 348 units has not been supported and more importantly, the desire by current and future faculty/staff to live in the type of housing proposed, has not been determined.

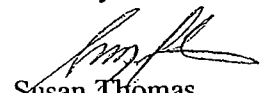
I-23-7

Considering the potentially numerous negative impacts to the Del Cerro community, the number of units proposed at Adobe Falls, cannot simply be "grabbed out of a hat". I insist that SDSU provide information that supports the need for each unit proposed at Adobe Falls. Additionally, SDSU cannot refer to a housing study without providing a comprehensive analysis of that study.

This has been a long road and a long fight between my community of Del Cerro, the greater Navajo and College areas, and SDSU. The groundwork was laid for an improved plan that would serve both the needs of SDSU and the surrounding neighborhoods, but again you failed. Your latest plan is easier to read, has more data, addresses more issues and answers a lot of questions. However, stand back and look at it as a whole. Practically every element of your Master Plan cannot be justified in it's entirety and enormity. Show sincerity in your plan and build what you need. No more!

I-23-8

Thank you.


Susan Thomas
6154 Arno Dr.
San Diego, CA 92120

cc: Governor Arnold Schwarzenegger
Senator Dennis Hollingsworth
Senator Christine Kehoe
Assemblywoman Shirley Horton
Assemblywoman Lori Saldana
Assemblyman George Plescia
County Supervisor Dianne Jacob
Council Member Jim Madaffer
SDUSD Superintendent Carl Cohn
SDUSD Board Member Katherine Nakamura
Leonard Bloom
Del Cerro Action Council

Bob and Mary Medearis
5862 Lancaster Drive
San Diego, Ca. 92120

July 20, 2007

San Diego State University
Business and Financial Affairs
5500 Campanile Drive
San Diego, Ca. 92182-1624

Re: EIR and Master Plan for Adobe Falls

Gentlemen,

Once again we wish to express our deepest concerns for your plans as presented in this EIR. We believe you have never fully addressed the impact of the traffic this Master Plan will have upon our community. SDSU has misclassified our streets and has failed to acknowledge the impact that the additional traffic will have on our community. Both elementary schools, Hearst and Temple Emanuel will be greatly endangered by this additional traffic on Del Cerro Blvd as well as the children and elderly who live in the area.

I-24-1

The EIR states that SDSU will purchase uplands to mitigate the environmental impacts they will cause by building in the Adobe Falls area. We ask that SDSU explain in detail how they will accomplish this before the delicate balance of the environment is destroyed by your building. We ask that you do not disturb the sensitive habitat for various plants and animals that already live in that area. If that area is developed, what type of relief can be provided to our community for visitors who will undoubtedly come to use the area? Thus bringing more congestion to our community!

I-24-2

We do not believe that the purposed housing will bring the desired gain that the University desires, especially as the Real Estate market fluctuates. We also still have concerns about Fire safety and accessibility to our area, especially to the homes you plan to build in Adobe Falls. These issues should not be left for "after the fact" resolution, as we have been repeatedly told they would be. We believe that SDSU should appeal to the CSU board and the legislature for more appropriate resolutions to their growth needs. We also feel that any university professor making \$80,000 per year should be able to find better living accommodations in the San Diego area than this Plan provides. Perhaps the CSU system should consider how they pay their staff and adjust the scale accordingly.

I-24-3

I-24-4

I-24-5

Sincerely,

Bob and Mary Medearis

Bob & Mary Medearis

Cc: Gov. Arnold Schwarzenegger

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JUL 25 2007

Facilities Planning, Design
and Construction

CSU Board of Directors

Hon. Shirley Horton

Hon. Dennis Hollingsworth

Hon. Christine Kehoe

Hon. Diane Jacob

Hon. Mayor Jerry Sanders

Hon. Jim Madaffer

Hon. Mike Aguirre

Hon. Katherine Nakamara

5587 Adobe Falls Rd Unit D
San Diego, CA 92120-4471
July 22, 2007

RECEIVED
JUL 25 2007
Facilities Planning, Design
and Construction

Ms. Lauren Cooper, Associate Director
Department of Facilities Planning, Design and Construction
Administration Building, Room 130
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Dear Ms. Cooper:

After reading the Draft EIR, I have the following concerns regarding the Faculty/Staff Housing proposed in Adobe Falls.

Please give us your assurance that the buildings in Adobe Falls will house only faculty and staff and will never be converted to student housing in the future. We would like this assurance in the final EIR and in the covenants.

I-25-1

As far as accessing Smoke Tree's private driveways in the second phase, I am opposed to that notion for the following reasons:

All of the Smoke Tree roads are designated fire lanes; we do not have curbside parking or sidewalks. These fire lanes are approximately 22 feet wide and cannot accommodate 1,500 more ADTs. The roadway classification in the EIR is erroneous. Our physical safety and that of our pets would be impaired if 1,500 ADTs were added because we have no sidewalks nor any place to pull over. We must either drive or walk to one of 3 community mailboxes because the Post Office will not deliver mail to individual units. With 1,500 more ADTs planned, we will not be able to do this safely. Mail delivery, trash pickup, moving vans, repair trucks, appliance deliverers, streetlight maintenance, and emergency vehicles would basically stop any traffic flow as there would not be sufficient space to go around them if 1,500 ADTs were added.

I-25-2

Our fire lanes are privately funded and we simply cannot afford to repave more often than we already do for our own traffic needs.

I also disagree that the western side of Adobe Falls Road can handle 6,500 ADTs when it is not as wide as Del Cerro Blvd, which you are rating as the same 2-lane collector capacity roadway. You are rating Del Cerro Blvd to have a maximum desirable capacity at 5,000 ADTs, "LOS C." Yet you are rating the western side of Adobe falls Road with a higher capacity at "LOS D" to get the numbers to work to build more units. We request the same consideration for the west side of Adobe Falls Road. Additionally, your existing traffic numbers will need to be updated by the Levanto condominium project currently under construction. There is also a proposal for 50 more apartments on the North side of western Adobe Falls Road as well.

I-25-3

July 22, 2007
Page 2

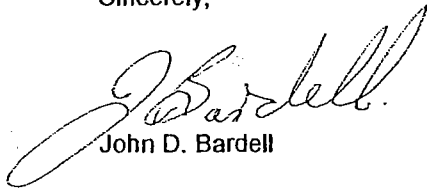
I object to the additional particulate matter and visual quality deterioration that would ensue from building a bridge over the flood control channel in Smoke Tree.

I-25-4

I also want your assurance, before the Lower Village is constructed, that we in Smoke Tree are assured that the development will not cause the rain runoff to be more than the flood channel can bear.

I-25-5

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Bardell".

John D. Bardell

ANITA COLMIE
 5563-B Adobe Falls Road
 San Diego, California 92120
 day telephone (858) 356-0150
 E-mail: anita@idanta.com

July 22, 2007

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 Facilities Planning, Design
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 and Construction

Ms. Lauren Cooper
 Associate Director
 Department of Facilities Planning, Design and Construction
 Administration Building, Room 130
 San Diego State University
 5500 Campanile Drive
 San Diego, CA 92182-1624

Re: **SDSU Masterplan and Draft Environment Impact Report (DEIR)**

Dear Ms. Cooper:

After reading the Draft EIR, I have the following concerns regarding the Faculty/Staff Housing proposed in Adobe Falls:

1. Please give us your assurance that the buildings in Adobe Falls will house only faculty and staff and will never be converted to student housing in the future. We would like this assurance in the final EIR and in the covenants.
2. **Issues Related to Smoke Tree:** As far as accessing Smoke Tree's private driveways in the second phase, I am opposed to that notion for the following reasons:

All of the Smoke Tree roads are designated firelanes; we do not have curbside parking or sidewalks. These firelanes are approximately 22 feet wide and cannot accommodate 1,500 more ADTs as discussed in the DEIR. The roadway classification in the DEIR is erroneous. Our physical safety and that of our pets would be impaired if 1,500 ADTs were added because we have no sidewalks nor any place to pull over. With the anticipated traffic load, we will not be able to back out of our garages.

We currently must either drive or walk to one of three community mailboxes because the Post Office will not deliver mail to individual units. With 1,500 more ADTs planned, we will not be able to do this safely. Mail delivery, trash pickup, moving vans, repair trucks, appliance deliverers, streetlight maintenance, and emergency vehicles would basically stop any traffic flow as there would not be sufficient space to go around them if 1,500 ADTs were added.

I-26-1

I-26-2

Furthermore, in the 2005 withdrawn EIR, Appendix O, Project Alternatives, the report by Linscott Law & Greenspan, Engineers, stated that it did not appear feasible to improve the private driveway to minimum public roadway standards. I cannot understand how the Smoke Tree fire lanes that are 22 feet wide on average with no pull-over room can have the same road capacity as a public city street that is 48 feet wide with curbside parking, such as that being used for the eastern side of Adobe Falls Road, Mill Peak Road, Arno Drive, Capri Drive, and Genoa Drive.

I-26-2
Cont.

Our firelanes are privately funded and we simply cannot afford to repave more often than we already do for our own traffic needs.

3. I also disagree that the western side of Adobe Falls Road can handle 6,500 ADTs when it is not as wide as Del Cerro Blvd which you are rating as the same 2-lane collector capacity roadway. You are rating Del Cerro Blvd to have a maximum desirable capacity at 5,000 ADTs, "LOS C", yet you are rating the western side of Adobe Falls Road with a higher capacity at "LOS D" to get the numbers to work to build more units. We request the same consideration for the west side of Adobe Falls Road. The western side of Adobe Falls Road has parallel parking on one side and stall parking on the other, which are fully used. The 2 driveable lanes are narrow and the city's MTS van used for disabled patrons cannot fit in one lane without going over the yellow lane divider.

I-26-3

Additionally, when the Lower Village is being planned, your existing traffic numbers will need to be updated by the Levanto condominium project currently under construction at the western end of Adobe Falls Road. There is also a proposal for 50 more apartments on the North side of western Adobe Falls Road.

4. I object to the additional particulate matter and visual quality deterioration that would ensue from building a bridge over the flood control channel in Smoke Tree as an alternate access for the Lower Village. Please be aware that in the time I have lived here, we have had several incidents of items falling off of Highway 8. A truck lost its tire and the tire flew over the embankment and bounced into our complex, fortunately, in between the units so no one was hurt.

I-26-4

A student's car went over the Highway 8 embankment and landed nose down into the flood channel. He lived. Another student was not so lucky and lost her life when her car went over Highway 8. I question the safety and wisdom of building this access road should it become financially feasible to do so.

5. If the Smoke Tree access alternatives are later considered when the Lower Village is planned, there needs to be noise level data addressing the impact of adding an access road over the flood control channel or adding more ADTs into Smoke Tree. In 2002, the city conducted a noise level test for Smoke Tree in the middle of the day and reported that we were 2 points under the established maximum of 65 dB so

I-26-5

we did not qualify for a sound barrier to be erected. Adding 1,500 ADTs per day, either through Smoke Tree or on a road erected over the existing flood control channel would push our noise levels higher than recommended. The statement in DEIR Section 3.10.5.2.7, page 3.10-15, that states that implementation of the Adobe Falls Road/Waring Road alternate access route for access into and out of the Adobe Falls Faculty/Staff housing Lower Village component would not result in significant noise impacts is false because you state that the additional traffic would create 2 more dB CNELs, which puts the noise levels in Smoke Tree at 65 dB or higher. This needs to be studied further before planning access through Smoke Tree for the Lower Village.

I-26-5
Cont.

6. I also want your assurance, before the Lower Village is constructed, that we in Smoke Tree are assured that the development will not cause the rain runoff to be more than the flood channel can bear.

I-26-6

7. **Noise level** Please note that the noise level tests were done in the middle of the day in Nov/Dec 2004 (DEIR Section 3.10.3.1), when most of the students were already at campus, and workers were at their jobs and it wasn't lunch time. The noise levels were at the possible lowest points. The trolley extension into SDSU opened on July 9th, 2005 and this will add additional noise which has not been factored in. Although theoretically the trolley makes little noise since it is powered electrically, we do hear a metal-on-metal screeching sound every time the trolley passes westbound with its brakes on due to the downward slope of the tracks. Additionally, since the trolley was built with a retaining wall behind it, traffic noises bounce off the wall making the traffic sounds louder. The noise levels really do need to be updated, and I disagree with the statement on page 3.10-4 of section 3.10.3.1 that any change in the noise measurements conducted in 2004 to 2007 are acoustically insignificant. In Section 3.10.3.1, site 4 and 5 noise levels were measured at the furthest points from the highway at the most northern edges of the project. To be fair, the measurement locations should be in the middle of the Upper and Lower Villages. Noise level tests should be conducted at various times of the day so that a 24-hour weighted average sound level is obtained.

I-26-7

8. **Air Quality** The long-term impact of the air quality is a huge concern. Since we live so close to Highway 8, there is already dangerous levels of emissions. However the DEIR is not measuring air quality on the site, but using the statistics for the San Diego Air Basin overall (DEIR Section 3.2.8.3, page 3.2-49). This is misleading to the proposed residents and to the CSU trustees who may be concerned about health issues of their staff. DEIR Section 3.2.3.5 states that particulate levels were measured in El Cajon but does not state whether this area is at all similar to the Adobe Falls area. This lack of disclosure may lead to liability issues for the State of California by the new SDSU residents not being aware of the exact risks of living next to Highway 8.

I-26-8

- | | | |
|-----|---|---------|
| 9. | Section 3.3.8.1.1, page 3.3-75, BR-2 states that SDSU shall purchase and preserve a total of 22.31 acres of uplands habitat which would contribute to the overall assembly of the MHPA preserve system in San Diego County and ensure that a sensitive area is preserved in perpetuity. Since SDSU already owns this type of land in Adobe Falls, why not just keep Adobe Falls as a preserve? Also the statement that SDSU is purchasing land is inconsistent with what is being told to the community, that being SDSU is not allowed to purchase land. | I-26-9 |
| 10. | DEIR Section 3.1, page 3.1-42, figure 3.1-22: This photograph is misleading. It is labeled that it is a view from Mill Peak Road, when it is in fact a view from College Blvd. The labeling needs to be corrected. The same photograph is also mislabeled in Appendix B, Figure 9b-2. | I-26-10 |
| 11. | Appendix E, The Cultural Resources section contains 4 confidential appendices: archaeological site record forms, archaeological records, sacred lands, and confidential maps. Please review to make sure all discloseable information is contained in the final EIR. | I-26-11 |

Thank you for your consideration into these matters.

Sincerely,



Anita Colmie

cc via email: Assemblywoman Shirley Horton, 78th Assembly District
State Senator Dennis Hollingsworth, 36th District
Senator Christine Kehoe, State District 39
City Councilman Jim Madaffer:

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RECEIVED

JUL 25 2007

Facilities Planning, Design
and Construction

July 22, 2007

Mr. Fulton,

We are opposed to the Adobe Falls Development. We believe any development in Adobe Falls would damage environmentally sensitive land. We believe any development would negatively impact our neighborhood. Economically our property values would decrease. Our streets would be beyond their designed capacity. Subsequently safety would be compromised. We deem it morally wrong for SDSU to develop Adobe Falls at the expense of the existing residents and environment.

I-27-1

The following are examples of but a few **omissions, misstatements and misrepresentations** include in the most recent EIR.

1. The EIR never fully addresses potential adverse traffic and safety impacts to Adobe Falls Road. In Figure 8-4, the EIR states 1040 ADT will be generated by the project on this street. However, these numbers are never again mentioned or included in a significant impact analysis. **SDSU does not fully disclosure the impacts to the street in question.** What mitigation measures will SDSU implement to mitigate the significant traffic impacts there, particularly in light of the existing uniquely sloped grade?

I-27-2

2. SDSU has **misclassified** our streets and the EIR states they have a capacity of **1500 ADT**. As a community member of Del Cerro, I insist that the streets of Arno, Genoa, Capri, Adobe Falls Road, Rockhurst and Lambda are Low Volume Residential Local Streets, with a capacity of only **700 ADT per day**.

I-27-3

3. The EIR invents levels of service (LOS) for our residential streets and claims these are found in the San Diego Roadway Classification Manual and LOS Table. **Absolutely NOT TRUE. Residential streets have no LOS rating.** This is because their primary purpose is to serve abutting lots and not to carry through traffic from one place to another.

I-27-4

I demand that SDSU acknowledge these LOS levels are fictitious and misleading and that they be removed from the EIR. I further demand that SDSU conduct an impacts analysis based on the percentage or magnitude of the increase in traffic volumes of these streets as they propose increases of more than 100%, and this certainly constitutes a significant adverse impact to local residents, pedestrians and bicyclists.

I-27-4
Cont.

4. The EIR acknowledges **Del Cerro Blvd's maximum desirable capacity, per the Navajo Community Plan, is 5,000 ADT.** It also acknowledges **Del Cerro Blvd is currently operating past that capacity by 170 ADT.** I demand that SDSU acknowledge that ANY amount of additional traffic on Del Cerro Blvd constitutes a significant adverse impact which must be mitigated or avoided, particularly because this is the only means of access/egress to the homes west of College Avenue, and because it adversely impacts the safety of residents and schoolchildren attending the schools at Phoebe Hearst and Temple Emanu-El.

I-27-5

5. **The intersection at Del Cerro Blvd and College Avenue already operates at unacceptable LOS of "E" in the peak morning hours and "D" in the peak afternoon/evening hours.** (EIR, p. 3.14-23) ANY amount of additional traffic there constitutes a significant adverse impact, particularly in light of its unique location -- the only means of access/egress to the homes west of College Avenue, and the primary means of access/egress for parents/children attending Phoebe Hearst/Temple Emanu-El schools. ANY amount of additional traffic poses safety hazards and necessarily diminishes emergency access/response times during those peak hours.

I-27-6

6. The EIR states SDSU will purchase mitigation uplands to mitigate the environmental impacts they will cause by building in the Adobe Falls area. This makes no sense. **If SDSU has funds to purchase mitigation land, why wouldn't the university use these funds to purchase and build on land that is not environmental sensitive?** A private developer would be barred from building on Adobe Falls. Why should the university be exempt from preserving this unique and rare environment? I find it ironic that an institution of higher learning, charged with educating the leaders of tomorrow, is willing to violate "ethics 101" to further its own economic growth.

I-27-7

7. The EIR states the Adobe Falls will be restored and trails will be put in place so the public can enjoy the area. From what I understand, this is the only waterfall in the City of San Diego. Further, it is an historical site. This type of restoration will certainly attract visitors from around the county, and is intended to do so. Yet **the EIR never accounts for the potential traffic generated by such an attraction.** As a community member of Del Cerro, I demand that SDSU include an analysis of these potential traffic impacts in its EIR.

I-27-8

We are committed to defeating the purposed development of Adobe Falls. SDSU has a moral obligation to protect this environmentally sensitive land and must commit to preserve it in perpetuity. SDSU has a moral obligation as educators of tomorrow's leaders to expand only if the interests of the public will not be irreparably harmed. Adobe Falls does not meet these criteria.

I-27-9

Sincerely,

Brian, Susan, Hailey Andrews

Brian, Susan and Hailey Andrews
6228 Capri Drive

Kathy Fennell 6003
 Adobe Falls Rd.
 San Diego, CA. 92120

July 22, 2007

Anthony Fuller, Director
 Facilities Planning and Management
 San Diego State University
 5500 Campanile Dr.
 San Diego, CA. 92182-164

RECEIVED
 JUL 25 2007
 Facilities Planning, Design
 and Construction

Dear Mr. Fuller:

I am writing to voice my opposition to SDSU's Master Plan for the proposed Adobe Falls development. Listening to you speak to the Del Cerro Action Council on the night of Thurs. July 12th, 2007 I got the distinct feeling that SDSU is going to do what it darn well pleases in spite of the objections and the safety of the areas residents. I will go on record one more time against the plan as it stands regardless of that fact.

I-28-1

I have lived on Adobe Falls Road for twenty-seven years. I am no lawyer and do not pretend to understand all of the prepared EIR. I do know that even your "revised" EIR does not honestly address adverse impacts. Adding 1040 ADT to our already stressed street is incomprehensible. If you have not driven down our street, I invite you to do so. The slope and narrowness of Adobe Falls Rd. presents a challenge even now to cars and emergency vehicles. The EIR does NOT address adverse traffic and safety impacts on this street.

I-28-2

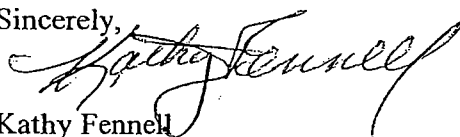
The EIR also acknowledges your development will increase the ADT's of Del Cerro Blvd past a recommended level. As you know, gridlock occurs at certain times of the day and the congestion at Del Cerro Blvd and College Ave is already holds a low "E" from the traffic analysis. The risk to the children of the two schools in the area is not worth any proposed growth by SDSU.

I-28-3

You have said that SDSU has agreed to pay their "fair share" of mitigating these foreseen problems. How can you say you will pay for something that has not been honestly and thoroughly evaluated and planned? In addition, and at the least, your mitigating resolutions should be set in motion prior to the start of development. I strongly recommend that you hold off on your plans and truthfully address our community's concerns for safety and traffic before SDSU sets out to ruin our neighborhoods.

I-28-4

Sincerely,


 Kathy Fennell

Cc:

Leonard Bloom
Senator Christine Kehoe
Assemblywoman Shirley Horton
Assemblywoman Lori Saldana
Assemblyman George Plescia
County Supervisor Dianne Jacob
Councilmember Jim Madaffer
San Diego Unified School District:
 Superintendent Carl Cohn
 Board Member Katherine Nakamura
San Diego City Mayor Jerry Sanders
Del Cerro Action Council

RECEIVED
JUL 25 2007Facilities Planning, Design
and Construction

Monday July 23, 3007

Anthony Fulton, Dir. of Facilities
 San Diego State University
 5500 Campanile Dr.
 San Diego, CA 92182-1624

Sir,

The issue of creating a high-density apartment complex in the Del Cerro community of individual homes is both minatory in concept and arrogated in its planning.

We are the original owners of our home in Del Cerro, purchased on the basis of its location, its individuality, the absence of automobile traffic, its local public school, a small shopping center and no apartment complexes!

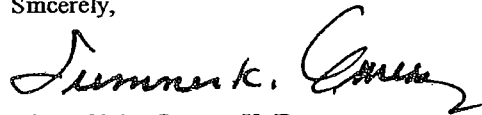
Now, after forty plus years of enjoying our Del Cerro community of individual homes, you and other officials of San Diego State University have chosen to radically alter our tranquil way of life through a portent plan to build a series of high-density condos in Adobe Falls (whose only egress will be through our neighborhood community).

I-29-1

Shame on you for your callous disregard of our homeowner community as well as the increased risks you will create for our neighborhood and the children who attend Phoebe Hearst Elementary School on Del Cerro Blvd.

You can be assured San Diego State University will be critically judged by the consequences of their action -- not their intentions!

Sincerely,



Mr. and Mrs. Summer K. Emery
 6168 Capri Drive
 San Diego, CA 92120

CC: Leonard Bloom, Senator Christine Kehoe, Assemblywoman Shirley Horton, Assemblywoman Lori Saldana, Assemblyman George Plescia, Supervisor Diane Jacob, Councilman Jim Madaffer, Superintendent Carl Cohn, Board Member Katherine Nakamura

July 23, 2007

Mr. Anthony Fulton
Director, Department of Facilities Design
San Diego State University
5500 Campanile Drive
San Diego CA 92182-1624

RECEIVED
JUL 25 2007
Facilities Planning, Design
and Construction

We continue to object to SDSU's planned 172 condos in Adobe Falls. More vehicles, congestion, noise, pollution and danger on one's neighborhood streets are not something any reasonable person or family would desire. Planners and supporters of this project, please ask yourselves if you would want the same project impacting your streets and neighborhoods.

Residents living west of College Ave. must use the short, narrow segment of Del Cerro Blvd. between College Ave. and Capri, to enter and exit this neighborhood. Even without the additional 1040 (or probably more) daily trips, this portion of Del Cerro Blvd. is very narrow, congested, slow and dangerous. Equally worrisome is Capri Drive which those who live on many feeder streets must use. It has curves and no median line and drivers zoom around the first curve and then onto Arno, Helena and Genoa with no thought as to who might be approaching from the opposite direction. More vehicles could certainly lead to a tragedy.

I-30-1

Do you realize there are many elderly residents living on the west side of College? This frequently brings paramedics in fire trucks and accompanying ambulances. Will the paramedics coming to assist us or our neighbors be delayed at the bottleneck getting in and out of Del Cerro? Every minute is crucial when it comes to heart attacks and strokes.

I-30-2

Consider the children taken to and picked up at Hearst School and Price Family Preschool, those who walk to school, and the many recreational walkers. Also, please consider the construction and expansion in progress at Temple Emanu El. Upon its completion next year, additional traffic will be generated. A new traffic survey will be needed after the new facility is in use.

I-30-3

There are many other issues that need to be addressed before your project moves forward. We want to know why the condos are more important than the safety and well being of the current Del Cerro residents.

I-30-4

Thank you for your attention.

Walt and Marilyn Tom

Walt and Marilyn Tom
6184 Arno Drive
San Diego CA 92120

Cc: local government officials

From:
Ray V. Schumacher, Jr. and Suzanne D. Schumacher
6160 Arno Drive
San Diego, CA 92120

July 23, 2007

To:
Lauren Cooper
Associate Director, Department of Facilities Planning, Design and Construction
Administration Building, Room 130
San Diego State University
5500 Campanile Drive
San Diego, California 92182-1624

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and Construction

After attending meetings and reviewing the Adobe Falls portion of SDSU's EIR, we object to this project for the following reasons:

1. The Plan simply does not support need for, or otherwise justify the development of State funded housing for faculty and staff. Such development will do nothing to provide higher education needs of underprivileged students, nor support cultural needs, nor create economic development, nor attract new private industry to the area, nor establish new research, nor provide tax base, nor in fact provide housing on highly desirable property. Simply making the statement that SDSU can offer this housing as an incentive to attract teachers and staff is insufficient without analysis of need and solution. Offering townhouses crowded on a slope and gulch appears to broadbrush the subject of housing supply and demand, which has had its ups and downs over the years in San Diego. If the private sector can attract personnel without subsidizing housing while often paying less than teaching salaries, then SDSU should be in competition with other universities without this. In fact, it might be more cost effective to simply use this development money and its administrative costs over the years toward teachers' salaries or scholarships and stipends.

2. The EIR is too general and not specific with regard to environmental problems created by the project and full solutions to their adverse impacts. For instance:

(A) The EIR never fully addresses potential adverse traffic and safety impacts to Adobe Falls Road. Only a traffic count of 1040 ADT is mentioned with no analysis of its impact on such a steep, narrow, twisting road.

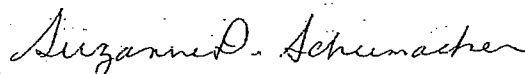
(B) SDSU has misclassified our streets in the EIR. Arno Dr, Helena Pl, Genoa Dr, Capri Dr, Adobe Falls Rd, Rockhurst, and Lamda are Low Volume Residential Local Streets with a capacity of only 700 ADT. The EIR also invents its own levels of service (LOS) for these streets and in error claims they are found in the San Diego Roadway Manual and LOS Table. Residential streets have no LOS rating since their purpose is to serve abutting lots and not to carry through traffic from one place to another. These findings should be removed from the EIR. Actually, traffic on these streets will be INCREASED by more than 100%, which constitutes a significant adverse impact to the residents, which includes pedestrians, bicyclists, and children.

(C) The EIR acknowledges Del Cerro Boulevard's maximum desirable capacity at 5,000 ADT, while realizing that it presently exceeds that capacity by 170 ADT. SDSU must recognize that any amount of increase here constitutes a significant adverse impact which must be mitigated or avoided, particularly because this is the only practical means of access/egress to the west of College Av. and adversely impacts safety of residents and school children bussed in to attend Phoebe Hearst and Temple Emanu-El schools on Del Cerro Blvd at Capri Dr.

3. This project appears to be a waste of State financial resources combined with callous disregard for a neighboring community that has been here for over 50 years. Del Cerro is one of San Diego's most self-sufficient, convenient, well-planned, and beautiful places to live. If approved by the California State University Trustees such action will go down as an heinous abuse of power by a government agency.

Respectfully submitted,


Ray V. Schumacher, Jr.


Suzanne D. Schumacher

I-31-1

I-31-2

I-31-3

I-31-4

I-31-5

July 23, 2007

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Facilities Planning, Design
and Construction

Mr. Anthony Fulton
Director, Facilities Design, Planning and Construction
San Diego State University

Ref: SDSU Campus Master Plan Environmental Impact Report

Dear Mr. Fulton:

As a resident of Del Cerro, I am naturally concerned about how SDSU plans to meet the growing educational needs of the greater San Diego region and the negative impact that plan may have on the quality of life in the communities boarding the university. Recent litigation and input from affected residents would suggest these concerns are in conflict with one another - the communities will suffer as the university grows. I do not believe that has to be the case. My cursory review of the Environment Impact Report (EIR) of the Campus Master Plan (CMP) identified several issues, which if addressed, will improve understanding and help foster broader support.

I-32-1

A major weakness in the EIR is traffic mitigation. As you know, the CMP projects that SDSU enrollment will grow by 10,000 students by 2025. The increase will require traffic mitigation to alleviate the congestion that would otherwise occur. The EIR in Section 16.2 of Appendix N outlines the actions that should be taken. The list is extensive and will be costly to implement. The university's strategy to deal with this important issue is to negotiate its fair share of the mitigation cost with the city. The EIR calculates the university's share to be the traffic increase from growth as a percentage of the total traffic (1). This methodology is very favorable for the university transferring the vast majority of the cost to the city. To avoid future conflicts and possible litigation, the EIR needs to confirm that the city supports the university's cost sharing scheme and provide a cost estimate for the recommended improvements.

I-32-2

Other issues related to congestion, traffic mitigation, and safety, but specific to Del Cerro, include:

1. Del Cerro Blvd will be the primary egress route for residences of the proposed Upper and Lower Villages. The EIR acknowledges that traffic on Del Cerro Blvd already exceeds its maximum desirable capacity. The additional traffic is a safety concern because of children attending the schools at Phoebe Hearst and Temple Emanu-El. The EIR needs to include a mitigation plan.
2. The EIR fails to address the impact on Adobe Falls Road. In figure 8-4 of Appendix N, the EIR estimates the future daily traffic at 1040 vehicles, well above current levels, but does not offer a mitigation plan. This is of particular concern due the steepness of Adobe Falls Road and the safety issues that may be created.

I-32-3

I-32-4

Your review and response to these issues is respectfully requested.

Sincerely,



Michael Haak
5937 Ridgemoor Dr.
San Diego, Ca 92120

CC: Jerry Sanders, Mayor; Jim Madaffer, Councilmember; Anne Brunkow, DCAC
(1) Reference Appendix Q in Appendix N, Technical Traffic Report

LEIGH JACOBSON
6202 CAPRI DRIVE
SAN DIEGO, CA 92120
(619) 501-6232
JAKE.JACOBSON@COX.NET

July 23, 2007

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Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RE: SDSU's 2007 Master Plan

Dear Mr. Fulton,

I have reviewed SDSU's proposed master plan and attended the local community meetings at which you spoke.

As a resident of Del Cerro, I am most concerned about the additional traffic in our neighborhood.

Intersection of College and Del Cerro Blvd. At the community meeting I attended on July 12, you stated no mitigation for the additional traffic that will impact the intersection of College and Del Cerro Blvd will be called for by the construction of 48 units in the "upper village". Del Cerro Blvd already operates an unacceptable level of "E" in the peak morning hours and "D" in the peak afternoon hours. The intersection of Del Cerro and Capri (no light) is very busy in the morning hours with parents dropping children off at the elementary school. In the afternoon, cars are parked on both sides of Capri for a block as parents walk to the school the pick up their children. Temple Emanu-El has been closed for construction. When their school is operating again, traffic will increase substantially. The area of College, Del Cerro Blvd, and Capri just cannot handle any more traffic.

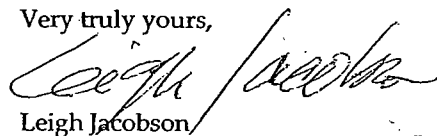
I-33-1

Adobe Falls Road. As you know, this is a very steep road with cars parked on both sides of the street. A sharp turn is required from Mill Peaks Road on to Adobe Falls Road. I am very concerned about emergency responses to that area, both for the current residents and residents of any development of yours. The fires of 2003 should make us all nervous about development in canyon areas.

I-33-2

The above are only two areas of concern that have not been adequately addressed in the E.I.R.

Very truly yours,


Leigh Jacobson

CC: Leonard Bloom, 2851 Camino Del Rio South, Ste 400, San Diego, CA 92108
Senator Christine Kehoe, senator.kehoe@sen.ca.gov
Assemblywomen Shirley Horton, assemblymemeber.Shirley.horton@assembly.ca.gov
Assemblywoman Lori Saldana, assemblymember.saldana@assembly.ca.gov
Assemblyman George Plescia, assemblymember.plescia@assembly.ca.gov
County Supervisor Dianne Jacob, Dianne.Jacob@sdcounty.ca.gov
Councilman Jim Madaffer, jmadaffer@sandiego.gov

July 23, 2007

Anthony Fulton
 Director, Department of Facilities Design, Planning & Construction
 Division of Business and Financial Affairs
 San Diego State University
 5500 Campanile Drive
 San Diego, CA 92182-1624

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Dear Mr. Fulton,

I object to the Adobe Falls section of San Diego State University's (SDSU) new Master Plan and Environmental Impact Report (EIR) which was conducted in support of SDSU's plans to build a high density condominium complex in my Del Cerro neighborhood.

The following points call out some of the erroneous information covered in the EIR:

1. SDSU has misclassified our streets and the EIR states they have a capacity of 1500 ADT. As a resident and community member of Del Cerro, I would insist that the streets of Arno, Genoa, Capri, Adobe Falls Road, Rockhurst and Lambda are Low Volume Residential Local Streets, with a capacity of only 700 ADT per day.
2. The EIR states the Adobe Falls will be restored and trails will be put in place so the public can enjoy the area. From what I understand, this is the only waterfall in the City of San Diego. Further, it is an historical site. This type of restoration will certainly attract visitors from around the county, and is intended to do so. Yet the EIR never accounts for the potential traffic generated by such an attraction. As a community member of Del Cerro, I would demand that SDSU include an analysis of these potential traffic impacts in its EIR.
3. The EIR states SDSU will purchase mitigation uplands to mitigate the environmental impacts they will cause by building in the Adobe Falls area. I would ask SDSU to explain how they have the power to purchase these lands, but yet, do not have the power to purchase property elsewhere which would be more suitable for faculty/housing and would not disturb a sensitive environmental habitat for various species of plants and animals.
4. The EIR never fully addresses potential adverse traffic and safety impacts to Adobe Falls Road. In Figure 8-4, the EIR states 1040 ADT will be generated by the project on this street. However, these numbers are never again mentioned or included in a significant impact analysis. If I were a resident on Adobe Falls Road, I would demand that SDSU do a full disclosure and analysis of the impacts to that street and ask what mitigation measures they propose for the significant traffic impacts there, particularly in light of the existing uniquely sloped grade.
5. The EIR invents levels of service (LOS) for our residential streets and claims these are found in the San Diego Roadway Classification Manual and LOS Table. Absolutely NOT TRUE. Residential streets have no LOS rating. This is because their primary purpose is to serve abutting lots and not to carry through traffic from one place to another. I would demand that SDSU acknowledge these LOS levels are fictitious and misleading and that they be removed from the EIR. I would further demand that SDSU conduct an impacts analysis based on the percentage or magnitude of the increase in traffic volumes of these streets as they propose increases of more than 100%, and this certainly constitutes a significant adverse impact to local residents, pedestrians and bicyclists.

I-34-1

I-34-2

I-34-3

I-34-4

I-34-5

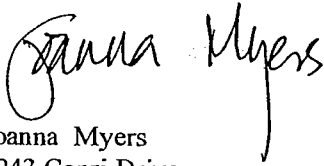
6. The EIR acknowledges Del Cerro Blvd's maximum desirable capacity, per the Navajo Community Plan, is 5,000 ADT. It also acknowledges Del Cerro Blvd is currently operating past that capacity by 170 ADT. I would demand that SDSU acknowledge that ANY amount of additional traffic on Del Cerro Blvd constitutes a significant adverse impact which must be mitigated or avoided, particularly because this is the only means of access/egress to the homes west of College Avenue, and because it adversely impacts the safety of residents and schoolchildren attending the schools at Phoebe Hearst and Temple Emanu-El.

-I-34-6

I ask that you acknowledge the falsehoods and oversights of the EIR, and respond to the objections of the community, city officials and the Fire Department who oppose this plan, by finding an alternative and more suitable location for your high density condominium development effort.

-I-34-7

Respectfully,



Joanna Myers
6243 Capri Drive
San Diego, CA 92120

cc:

Leonard Bloom
Greater Centurion Corp.
2851 Camino Del Rio South
Suite 400
San Diego, CA 92108

Senator Christine Keho
2445 5th Avenue, #200
San Diego, CA 92101

Assemblywoman Shirley Horton
7144 Broadway
Lemon Grove, CA 91945

Assemblywoman Lori Saldana
1557 Columbia Street
San Diego, CA 92101

Assemblyman George Plescia
9099 Mira Mesa Blvd., #130
San Diego, CA 92131

County Supervisor Dianne Jacob
County Administration Center
1600 Pacific Highway
San Diego, CA 92101

Councilmember Jim Madaffer
202 C Street
San Diego, CA 92101

Carl Cohn
Superintendent
San Diego Unified School District
4100 Normal Street, #2231
San Diego, CA 92103

Katherine Nakamura
Board Member
San Diego Unified School District
4100 Normal Street, #2231
San Diego, CA 92103

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Facilities Planning, Design
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Susan Wood
6202 Capri Drive
San Diego, CA 92120
858.220.2480
effimoff@cox.net

July 23, 2007

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RE: SDSU's 2007 Master Plan

Dear Mr. Fulton,

I am a resident of Del Cerro and have been following with interest your proposed residential development in the Adobe Falls Area. I have serious concerns about the increased traffic any development in the Adobe Falls area will add to our residential streets.

I question the EIR's classification of our streets and therefore capacity of our neighborhood streets. Arno, Genoa, Capri, Adobe Falls Road, Rockhurst and Lambda are low volume residential streets. As it is, most traffic from the Adobe Falls area takes the path of Arno then Capri to Del Cerro Blvd, either to avoid driving through the school zone in front of Hurst Elementary or to avoid the intersection of Del Cerro Blvd and Genoa (very difficult to see on coming traffic from the west). It seems to me that most of the new traffic that your development would generate will take the same route, placing the burden of increased traffic on the streets of Arno and Capri. The EIR does not take this into account.

I-35-

Also, the EIR does not address how additional traffic that will be attracted to the area due to the walking paths you plan for the Adobe Falls area will be handled. Where is the parking lot? Will they be parking on the residential streets, further impeding traffic.

I-35-2

Thank you for your consideration to these concerns.

Sincerely,

Susan Wood
Susan Wood

CC: Leonard Bloom, 2851 Camino Del Rio South, Ste 400, San Diego, CA 92108
Senator Christine Kehoe, senator.kehoe@sen.ca.gov
Assemblywoman Shirley Horton, assemblymember.Shirley.horton@assembly.ca.gov
Assemblywoman Lori Saldana, assemblymember.saldana@assembly.ca.gov
Assemblyman George Plescia, assemblymember.plescia@assembly.ca.gov
County Supervisor Dianne Jacob, Dianne.Jacob@sdcounty.ca.gov
Councilman Jim Madaffer, jmadaffer@sandiego.gov

7/24/2007

Lauren Cooper, Associate Director
 Department of Facilities Planning, Design and Construction
 Administration Building, Room 130
 San Diego State University
 5500 Campanile Drive
 San Diego, California
 92182-1624

RECEIVED
 JUL 25 2007
 Facilities Planning, Design
 and Construction

Cc: Sen. Dennis Hollingsworth, Assemblywoman Shirley Horton, Sen. Christine Kehoe, Councilmember Jim Madaffer, Assemblyman George Plescia, Assemblywoman Lori Saldana, Mayor Jerry Sanders, Gov. Arnold Schwarzenegger

RE: Adobe Falls/North Campus component of the SDSU Master Plan

Ms. Cooper,

I would like to bring to your attention my family's concerns with SDSU's 2007 Draft EIR, in particular the Adobe Falls Faculty/Staff Housing project. As property owners residing on Adobe Falls Road we find the proposed development to be out of character with existing development and assert proposed construction will create undue burden on existing infrastructure, negatively impacting our quality of life and property value.

I-36-1

The existing street, Adobe Falls Road, is of cul-de-sac design featuring approximately 41 single family residences on lots sized roughly from 7,000 sf to 14,000 sf. The Adobe Falls Faculty/Staff Housing project comprised of 348 multi-family dwellings is wholly incompatible with existing development. It should be noted that the City of San Diego's Street Design Manual dictates a maximum ADT of 200 for cul-de-sacs¹. The Draft EIR incorrectly labels Adobe Falls Road a "Residential Local Street" capable of handling 1,500 ADT². We assert the low ADT limit is warranted given the physical characteristics of the street including steep grade in excess of 10% and sharp curve, finding the projected 1,040 ADT for Adobe Falls Road³ to be unfeasible. Furthermore, arterial streets such as Del Cerro Blvd. serving primary ingress and egress duty for this community already exceed the 5,000 ADT maximum design capacity by 170 trips⁴, a number which would be even more severely impacted by the increased traffic volume from the proposed housing development.

I-36-2

I-36-3

Traffic and housing design incongruent with existent development are but one concern. Full perusal of the 2007 Draft EIR raises many concerns in regard to the Adobe Falls Faculty/Staff Housing Project. Full treatment in this letter is impractical and would likely exceed most readers' patience, but let it be known proposed development will most certainly wreak irreparable damage upon environmentally sensitive wildlife and fauna habitats (Section 3.3), further maim the Adobe Falls Historical Landmark (Appendix E.), deplete cultural artifacts such

I-36-4

¹ San Diego's Street Design Manual, pg. 118

² Draft EIR for the SDSU 2007 Campus Master Plan Revision, Section 3.14, pg. 12

³ Draft EIR for the SDSU 2007 Campus Master Plan Revision, Section 3.14, Figure 8-4

⁴ Draft EIR for the SDSU 2007 Campus Master Plan Revision, Section 3.14, Table 3.14-9

as Bedrock Milling Features and other historically significant evidence (Section 3.4) significantly increase rainwater runoff within a 100-year floodplain (Section 3.7) and ruin paleontological resources (Section 3.11). This area has many times been proposed by persons within the university, local community and city & regional government to become an open space park. We find particularly poignant a written letter to SDSU administration by Professor Dr. John Todd urging preservation of this site, stating "the need for this kind of property becomes increasingly urgent as we are forced to put more earth under concrete"⁵.

I-36-4
Cont.

I urge the CSU Board of Trustees and others with influence upon this matter to consider the effects upon existing residents, respect the intrinsic value in the Adobe Falls Historical Landmark, avoid the significant unmitigable effects of this component by approving the "No Adobe Falls Faculty/Staff Housing Alternative"⁶, described in the Draft EIR for the SDSU 2007 Campus Master Plan Revision. I encourage the CSU system in this modern "Internet Age" to ramp up its use of digital technologies such as distance learning, further implement flexible scheduling and year-round operations, increase the capacity of existing off-campus centers and foster increased FTES levels through more efficient use of existing physical resources⁷. SDSU is almost a ghost town in the summer months, a welcome respite for nearby residents but an underutilized resource waiting to be tapped by students desirous of graduating within a reasonable time-frame.

I-36-5

Sincerely



John Hale, P.E.
5871 Adobe Falls Road
San Diego, CA 92120

⁵ Draft EIR for the SDSU 2007 Campus Master Plan Revision, Appendix E, approximately pg. 118 within newspaper clipping titled "Adobe Falls - Our City's Forgotten Park"

⁶ Draft EIR for the SDSU 2007 Campus Master Plan Revision, Executive Summary, Section VIII.c

⁷ Draft EIR for the SDSU 2007 Campus Master Plan Revision, Appendix O, pg. 3

Bob Glynn

From: Bob Glynn [boglynn@cox.net]
Sent: Sunday, June 24, 2007 12:01 PM
To: 'masterplan@sdsu.edu'
Subject: Master Plan Objection

I-37-1

As a neighbor of SDSU I have read your Master Plan for the potential growth of the University and paid particular attention to Section 5. I deeply object to any plan that would use the PRIVATE road(s) presently within the Adobe Falls condos. These roads are little more than glorified driveways which provide firefighting and other emergency service access to the neighborhood. They are privately maintained and funded and cannot handle a large increase in traffic. Unfortunately, I will be out-of-state for the Del Cerro public meetings scheduled for June 28 and July 12, 2007; your Master Plan is on the agenda. If I could attend, I would definitely voice my objection to your plan. Please pass on my objections to Chancellor Webber.

Sincerely,
Robert T. Glynn

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JUL 25 2007

Facilities Planning, Design
and Construction

6/24/2007

Tony Fulton, 11:14 AM 7/25/2007, Fwd: SDSU's Adobe Falls Development

X-Mailer: QUALCOMM Windows Eudora Version 6.2.1.2
 Date: Wed, 25 Jul 2007 11:14:05 -0700
 To: cooper12@mail.sdsu.edu
 From: Tony Fulton <afulton@mail.sdsu.edu>
 Subject: Fwd: SDSU's Adobe Falls Development
 X-Junkmail-Status: score=10/50, host=mail.sdsu.edu
 X-Junkmail-SD-Raw: score=unknown,
 refid=0001.0A090207.46A792ED.00F7-E-7QPKmLhV8HmggkxG8adotQ==.VTL=0,
 ip=146.244.16.206,
 so=2006-12-09 10:45:40,
 dmn=5.1.5/2006-01-31

To: afulton@mail.sdsu.edu
 Subject: SDSU's Adobe Falls Development
 Date: Wed, 25 Jul 2007 13:29:58 -0400
 X-MB-Message-Source: WebUI
 X-MB-Message-Type: User
 From: danzurman@aim.com
 X-Mailer: AIM WebMail 28518
 X-AOL-IP: 205.188.212.217
 X-Spam-Flag: NO
 X-Junkmail-Status: score=10/50, host=razorgw1.sdsu.edu
 X-Junkmail-SD-Raw: score=unknown,
 refid=st=0001.0A090205.46A789D0.009D,ss=1,fgs=0,
 ip=205.188.157.38,
 so=2006-12-09 10:45:40,
 dmn=5.3.14/2007-05-31

Dear Mr. Fulton,

As a 16 year resident of the <?xml:namespace prefix = st1 ns = "urn:schemas-microsoft-com:office:smarttags" />San Diego residential community of Del Cerro, I wish to register my **strong objection** to SDSU's plan to develop and build a high-density housing development in the Adobe Falls area of our neighborhood due to the adverse impact it will forever burden the current and future residents of our neighborhood with, most particularly the substantially *increased* vehicular/street traffic which will negatively impact *several* of our residential streets.

I-38-1

It is my understanding that SDSU's 33 acre master plan is to *eventually* develop 540 high-density apartments/townhomes/senior housing units in the Adobe Falls area, and that SDSU's proposal has misrepresented/misclassified* the traffic levels our residential streets can bear-up under.

Why doesn't SDSU simply do the right thing now, not only for the residents of Del Cerro, but for all those who will eventually populate these all those high-density living units, and construct ingress and/or egress access directly to Interstate 8 adjacent their development?

I-38-2

<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />
 Our streets, neighborhood, and residents should not be required to shoulder the increased traffic

burden that would be caused by this development.

Sincerely,

Dan Gels

I-38-2
Cont.

* It is my understanding that:

1. The EIR never fully addresses potential adverse traffic and safety impacts to Above Falls Road. In Figure 8-4, the EIR states 1040 ADT will be generated by the project, but these numbers are never again mentioned or included in a significant impact analysis.

I-38-3

2. SDSU has misclassified Arno, Genoa, Capri, Adobe Falls Road, Rockhurst, and Lambda as having a capacity of 1500 ADT, when in fact that capacity should be 700 ADT per day.

I-38-4

3. The EIR "invents" levels of service (LOS) for these residential streets and claims these are found in the San Diego Roadway Classification Manual and LOS Table, which is not true, as "residential streets" have no LOS rating because their primary purpose is to serve abutting lots and not to carry through traffic from one place to another.

I-38-5

4. The EIR acknowledges Del Cerro Blvd's maximum desirable capacity, per the Navajo Community Plan, is 5,000 ADT. It also acknowledges that Del Cerro Blvd. is already currently exceeding that capacity by 170 ADT.

I-38-6

Check Out the new free AIM(R) Mail -- Unlimited storage and industry-leading spam and email virus protection.

16 July 2007

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Re: SDSU Revised Masterplan and EIR (Adobe Falls)

Dear Mr. Fulton,

My name is Anthony Colangelo and I am an SDSU Alumni (Mechanical Engineering 1989) and Del Cerro residing on Adobe Falls Rd (since 1993). I am thoroughly amazed at the lack of responsibility SDSU has shown on this part of the project. I am even a little embarrassed that SDSU is shown on my diploma after exhibiting a total disregard for the safety of the surrounding neighborhood.

I truly do support the university's desire to grow and the need for new housing. I do not even object to the location in the Adobe Falls area, but I do object to using our tiny (and steep) neighborhood streets to access this project. It is very obvious that you and your staff (except for your traffic counters) have never driven down Adobe Falls Rd.

Adobe Falls Road is very steep and winding and most always has cars parked on both sides. It is **NOW** quite dangerous when you try to navigate these steep curves with a car parked on your right, a speeding vehicle coming toward you on your left while they try to miss you and the parked car on their right. And this is NOT a through street. I could not imagine ANY more cars traveling on this street.

If any private builder were to request a permit to build in the Adobe Falls canyon, they would be required by the City of San Diego to provide other access and egress to their project. As an engineer, I am extremely upset that not only has SDSU's consultants seem to think our small streets can take the increased load, they are even disregarding the conclusions of our own city engineers because it CAN since it is a state entity. This seems doubly incompetent.

In your EIR, you never fully address potential adverse traffic and safety impacts to Adobe Falls Road. In Figure 8-4, the EIR states 1040 ADT will be generated by the project. However, these numbers are never again mentioned or included in a significant impact analysis. SDSU needs to do a full disclosure and analysis of the impacts to that street and tell us what mitigation measures they propose for the significant traffic impacts there, particularly in light of the existing steeply sloped grade.

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I-39-1

I-39-2

The only thing that SDSU has done to improve the EIR is to reduce the number of units. SDSU must find new access and egress for any number of units **AND NOT OPEN ANY ACCESS VIA MILL PEAK OR ADOBE FALLS RD.**

I-39-2
Cont.

SDSU has misclassified our streets and the EIR states they have a capacity of 1500 ADT. Arno, Genoa, Capri, Adobe Falls Road, Rockhurst and Lambda are **Low Volume** Residential Local Streets, with a capacity of only 700 ADT per day.

I-39-3

Your EIR states some levels of service (LOS) for our residential streets and claims these are found in the San Diego Roadway Classification Manual and LOS Table. It is my understanding that residential streets have no LOS rating. This is because their primary purpose is to serve abutting lots and not to carry through traffic from one place to another. SDSU should remove these from the EIR and acknowledge these LOS levels are fictitious and misleading.

I-39-4

In the midst of all this are two schools, Hearst Elementary and Temple Emanu-El. This congested area is already almost gridlocked when parents are dropping off and picking up their children. This situation is a bit worse than normal since Del Cerro Blvd is divided into two very narrow lanes right in front of the school. Many people who approach the school from the west must make a U-Turn to drop their kids off, then, if needing to go to work via I-8 they will need to make another U-Turn to head back east to get to College Avenue. Any more traffic in this area would certainly result in problems (hopefully not the death of any children being hit by cars).

I-39-5

Your EIR states SDSU will purchase mitigation uplands to mitigate the environmental impacts they will cause by building in the Adobe Falls area. What unique power does SDSU have to purchase these lands, but yet, do not have the power to purchase property elsewhere which would be more suitable for faculty/housing and would not disturb a sensitive environmental habitat for various species of plants and animals.

I-39-6

Your also EIR states the Adobe Falls will be restored and trails will be put in place so the public can enjoy the area. I think this is the only waterfall in the City of San Diego and it is an historical site. This type of restoration will certainly attract visitors from around the county, and is intended to do so. Yet your EIR never accounts for the potential traffic generated by such an attraction. I think an analysis of these potential traffic impacts is needed in its EIR.

I-39-7

SDSU should conduct an impacts analysis based on the percentage or magnitude of the increase in traffic volumes of these streets as they propose increases of more than 100%, and this certainly constitutes a significant adverse impact to local residents, pedestrians and bicyclists.

I-39-8

Per the Navajo Community Plan, Del Cerro Blvd's maximum desirable capacity, is 5,000 ADT. Your EIR acknowledges that Del Cerro Blvd is currently operating past that capacity by 170 ADT. SDSU needs to acknowledge that **ANY** amount of additional traffic on Del Cerro Blvd constitutes a significant adverse impact which must be mitigated or avoided, particularly because this is the only means of access/egress to the homes west of College Avenue, and

I-39-9

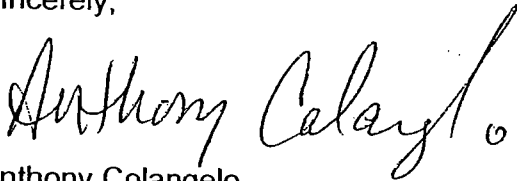
because it adversely impacts the safety of residents and schoolchildren attending the schools at Phoebe Hearst and Temple Emanu-El.

I-39-9
Cont.

I have also suspended my membership in the SDSU Alumni Association until this EIR is acceptable to us Del Cerro residents.

I-39-1

Sincerely,



Anthony Colangelo
SDSU Alumni Class of 1989
Del Cerro Resident

cc.

Leonard Bloom, Greater Centurion Corp.

Governor Arnold Schwarzenegger, California

Senator Dennis Hollingsworth

Senator Christine Kehoe

Assemblyman George Plescia

Assemblywoman Shirley Horton

Assemblywoman Lori Saldana

County Supervisor Dianne Jacob

Councilmember Jim Madaffer

Superintendent Carl Cohn, San Diego Unified School District

Board Member Katherine Nakamura, San Diego Unified School District

From the Desk of Shelley Stone ~

July 23, 2007

Dear Anthony Fulton with the Department of Facilities Design,

I'm a new resident of the Del Cerro community, just moving into a wonderful home at the bottom of Adobe Falls Road. I bought this home specifically because it is on a quiet cul-de-sac. Since I work from home and have a family and pets, this quiet location was ideal and the reason I spent my savings on it.

*My backyard backs up against the acreage between me and SDSU and I can't tell you enough how much I enjoy the tranquility of a cup of coffee while listening to the stream running down from the falls, especially after a light rain. The beauty of this small piece of land is undeniable. **From my backyard I can see wild rabbits, a beautiful array of reptiles, and so many colorful birds ☺ Where will these animals go?***

*Then, to find out that SDSU is planning to destroy it with over 500 faculty homes, mostly for retired faculty no longer even part of the learning institution, is mind boggling. I also understand SDSU is mass marketing across the country for more and more faculty to squeeze into this area which will definitely cause a huge traffic problem! SDSU owns lots of land just over the freeway in the **College Area which can be developed much more easily and cheaply because the street structure, sewer system, lighting, etc.** is already in place. So why come across the freeway to my small intimate community full of schools, churches, and the elderly. And why doesn't SDSU **buy up existing properties** near the school that current home owners are willing to sell instead of building more? I see many SFR and condos with **"For Sale" signs on them within walking distance of the university.** These sellers would love to sell these homes to the university as they need to be sold. In fact, just on my block right behind SDSU there were 4 homes up for sale just last month. And I was wondering..why doesn't SDSU buy these homes if they are crying for housing?? My home, for example, would be a lovely home for a faculty family. But once this construction begins...*

I-40-1

I-40-2

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will be undesirable due to traffic congestion in the front and an obstructed, unsightly view in the back. There will be no famous Adobe Falls, no stream to listen to in the rain, no reptiles, no rabbit families to watch, no birds to feed....just roof tops.

I-40-2
Cont.

*And the traffic... 500 residences, each with 2 cars, equals 1,500 cars on my quiet cul-de-sac. To my understanding of the EIR report the Del Cerro area is already at maximum capacity and my Adobe Falls cul-de-sac is classified as a **Low Volume Residential Street with a capacity of 700**. This number is already met with existing home owners. How can you justify adding traffic for 500 more cars? $700 + 1,500 = 2,200$ cars on a road that is already listed as being full capacity?*

I-40-3

*My home, which is right at the bottom of Adobe Falls Road, will be hit hardest with daily construction trucks up and down the street for months on end. **The natural animals to the area will be displaced. Do you have homes for them?** This action seems greedy and hasty and certainly unnecessary since there are other options for SDSU. I wish the university had more desire to build a cohesive relationship with surrounding residents instead of becoming an intrusive eyesore eventually ruining the wonderful feel of this great community which has opened its arms to SDSU and its overflowing students and faculty.*

I-40-4



Sincerely ~ Shelley E. Stone

Cc: Governor Arnold Schwarzenegger; Senator Dennis Hollingsworth; Senator Christine Kehoe; Assemblywoman Shirley Horton; Assemblywoman Lori Saldana; Assemblyman George Plescia; County Supervisor Dianne Jacob; Councilmember Jim Madaffer; San Diego Unified School District Superintendent Carl Cohn

5811 Adobe Falls Road

San Diego, CA. 92120

Hm 619-255-8969

To: Ms. Lauren Cooper

July 23 2007

Associate Director
Department of Facilities Planning, Design and Planning Construction
Administration Building, Room 130
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Dear Ms. Cooper:

After reading the Draft EIR, I have the following concerns regarding the Faculty/Staff Housing proposed in Adobe falls.

Please give us your assurance that the buildings in Adobe Falls will house only faculty and staff and will never be converted to student housing in the future. We would like this assurance in the final EIR and in the covenants.

I-41-1

As far as accessing Smoke Tree's private driveways in the second phase, I am opposed to that notion for the following reasons:

All of the Smoke Tree roads are designated fire lanes; we do not have curbside parking or sidewalks. These fire lanes are approximately 22 feet wide and cannot accommodate 1,500 more ADTs. The roadway classification in the EIR is erroneous. Our physical safety and that of our pets would be impaired if 1,500 ADTs were added because we have no sidewalks nor any place to pull over. With must either drive or walk to one of 3 community mailboxes because the Post Office will not deliver mail to individual units. With 1,500 more ADTs planned, we will not be able to do this safely. Mail delivery, trash pickup, moving vans, repair trucks, appliance deliveries, streetlight maintenance, and emergency vehicles would basically stop any traffic flow as there would not be sufficient space to go around them if 1,500 ADTs were added.

I-41-2

Our fire lanes are privately funded and we simply cannot afford to repave more often than we already do for our own traffic needs.

I also disagree that the western side of Adobe Falls Road can handle 6,500 ADTs when it is not as wide as Del Cerro Blvd, which you are rating as the same 2-lane collector capacity roadway. You are rating Del Cerro Blvd to have a maximum desirable capacity at 5,000 ADTs, "LOS C". You are rating the western side of Adobe Falls Road with a higher capacity at "LOS D" to get the numbers to work to build more units. We request the same consideration for the west side of Adobe Falls Road. Additionally, your existing traffic numbers will need to be updated by the Levanto condominium project currently under construction. There is also a proposal for 50 more apartments on the North side of western Adobe Falls Road too.

I-41-3

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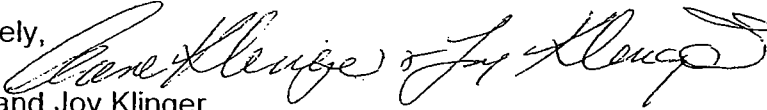
I object to the additional particulate matter and visual quality deterioration that would ensue from building a bridge over the flood control channel in Smoke Tree.

- I-41-4

I also want your assurance, before the Lower Village is constructed, that we in Smoke Tree are assured that the development will not cause the rain runoff to be more than the flood channel can bear.

- I-41-5

Sincerely,



Carol and Joy Klinger
5565C Adobe Falls Road

San Diego, CA 92120

July 22, 2007

Anthony Fulton
Director, Department of Facilities Design
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Mr. Fulton,

As a resident of Adobe Falls Road, I am extremely concerned about (1) the significant increase in traffic on my street, Adobe Falls Road, the SDSU expansion would create and (2) the adverse impact it will have on the safety of the residents on Adobe Falls Road.

The Environmental Impact Report that SDSU has submitted does not clearly and fully address the consequences of the increased traffic on safety on our street. The corner of Adobe Falls Road and Mill Peak Road is especially dangerous due to the unique slope of the street. In fact, several months ago the road was blocked at that intersection due to the failed brakes on a truck.

Specifically, nowhere in the Environmental Impact Report does SDSU explain (1) the impact of the "1040 Average Daily Trips" generated on Adobe Falls Road. (2) How did SDSU arrive at the "1500 Average Daily Trips" figure that would indicate that the streets in my neighborhood would be able safely handle this increased traffic.

As a long time homeowner on Adobe Falls Road, I am deeply concerned with your project, which will bring a projected "1500 Average Daily Trips" to a road that was designed for residential access with a capacity for "700 Average Daily Trips".

Respectfully submitted,



Mary Manzella

cc: Senator Christine Kehoe
Assembly woman Shirley Horton
Assembly woman Lori Sadana
Assemblyman George Plescia
County Supervisor Dianne Jacob
Council member Jim Madaffer

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Facilities Planning, Design
and Construction

Barbara Morton
6336 Cleo St.
San Diego, CA 92115
619-286-5481

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JUL 26 2007

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Facilities Planning, Design
and Construction

July 24, 2007

Dear Mr. Fulton,

I oppose SDSU's expansion for the following reasons:

SDSU is like a bully. A bully cares only for himself and his needs and has no respect for others or their concerns/needs. SDSU is a bully that for years has had no respect for the community. It has been either directly or indirectly beating up the community and its citizens-the taxpayers.

For years, SDSU has done nothing; I repeat nothing, to meet its duty to house its students. It turned a very blind academic eye to the fact that *single-family homes* near and far from the school (such as Pacific Beach and La Jolla) have and are being made into *mini-dorms* to house its students.

These mini-dorms destroy the street, block, neighborhood, community where they are. *They destroy the very fabric that makes a neighborhood.* Not only do they destroy the quality of life of the people who *intentionally* bought their home in an area *zoned* for *single-family homes*-not apartments, rooming houses, dorms or any other form of multi-person non-family living space, but they also devalue their homes. A bully's one, two punch on the citizenry. If serious changes are not made shortly, SDSU will have made a once desirable area into a *slum*. Failure to act is just as actionable as an act.

It is so bad in the College Area, two years ago, our Assemblywoman Shirley Horton, referred to the College Area as a ghetto. The College Area was not close to resembling a ghetto until SDSU shirked its duty to house its students. **SDSU has a duty. SDSU actively recruits students to come to the area. SDSU cannot just continue to benefit from its action and continue to ignore the nightmare it solely created.**

The College Area used to be a desirable area to live in. Not any more. What family wants to move next to and live by a house filled with partying, drunk, stoned, urinating,

I-43-1

defecating, vomiting, rude, trashy college students? The faculty does not want to live by students; well, we single-family homeowners do not want to either.

How can you tell if a town or neighborhood is dying? When families no longer live there; Sociology 101. Families have and are moving away from the College Area. SDSU is intentionally killing not only the College Area but also other neighborhoods and areas in the greater San Diego Area.

Not only has SDSU turned a very blind academic eye to the mini-dorm issue *it solely created and shirked its duty to house its students*, but it also has been the role model for its faculty to do the same. SDSU has at least one known faulty member, a coach, who took the low road of greed. This coach has injured the community with numerous mini-dorms at the same time enriching his own pocket.

Surely, no one can hold SDSU and this coach out to be stellar role models. Oh yes, they were. Two SDSU graduates filled not only the College Area, but also other areas of San Diego with mini-dorms. SDSU taught and instilled its values, greed and leadership well as at least one SDSU coach and two graduates emulate and practice them. Values, greed and leadership everyone can be proud of right. These are the very values, greed and leadership that have galvanized the citizenry/taxpayers against SDSU.

In the master plan and in all the meetings regarding the mini-dorms a constant gush about the students needing affordable housing is present. Let us look at some facts of living in San Diego. To buy a house in San Diego is something of a feat. The last time I heard only sixteen percent of the population could afford a home in San Diego. That was *sixteen percent* of the population. What makes SDSU students such a privileged class in housing? There are *families* in San Diego wanting the American dream of buying their own home and living in an area **zoned** for *single-family homes*. They want and need affordable housing. Mini-dorms deny them the opportunity to own a home in what used to be a nice affordable single-family home area and make their American dream a reality.

In the section regarding the Adobe Falls project it is stated, "*San Diego's housing costs are some of the highest in the nation*, and this is *impacting* the university's efforts to recruit and retain outstanding faculty and staff. Providing a more affordable housing option close to campus will help SDSU in its recruitment and retention efforts. *No students will be housed at Adobe Falls.*" (Emphases added.) The master plan is replete with statements about the high cost of housing here. SDSU acknowledges how high the housing costs are here. Yet *it did nothing to address housing its students and thus created an environment around it ripe for mini-dorms to prosper and proliferate, thereby destroying housing values and quality of life. No demand, no supply; Economics 101. SDSU knew it was doing this. By SDSU's own study it states students prefer living around the college. Further, it plans to continue to do this as it plans to have 50% of the student population live within a mile of the school. At the same time, SDSU claims not to be responsible for the destruction and harm. Recruiting, planning for and intentionally creating the environment for something are*

I-43-1
Cont.

all acts that equal responsibility for the outcome.

The master plan is a joke about the reality of mini-dorms. It fluffs over it. Wave an academic reality wand and it really does not exist. If SDSU *dumps* more students in this area, it deserves to be sued. *SDSU cannot continue to claim they have no authority or duty to handle the problem. SDSU solely created and planned the problem and has to accept the responsibility and consequences of its actions.*

The master plan is flawed. There are no plans to build numerous multi-use structures in the College Area. The grand Paseo development plan fell through.

SDSU has to cater to its students, but the single-family homeowners do not and are not interested in attracting, housing or taking care of them. It is unclear when this "master plan" was written or if it was completely updated. The date 2004 is replete. The 2007 single-family homeowners have had it and have been in city meetings akin to lynch mob fervor on this issue.

I returned home in June 2003. I heard about the ire over this issue while away and upon my return. The ire was present in 2003 and has continued to grow to the present, 2007. New construction codes and housing ordinances have been written because the anger is so great and wide spread now. Single-family homeowners have sued and won for the destruction and loss of the quality of life.

Additionally, if no students are allowed at Adobe Falls and as SDSU's President is said to have said, the faulty does not want to live next to students, well, *those of us who had to qualify and had the means to buy in this expensive housing market do not want to live next to them either. We intentionally bought in areas zoned for single-family homes* not mini-dorms, apartments, rooming houses or any other form of multi-person non-family living space.

Give us the respect we deserve for being able to buy our homes in this high priced market in areas zoned for single-family homes. The master plan is replete with how difficult SDSU and its faulty find it to do. Stop destroying our quality of life and devaluing our homes.

Also, if it is such a hardship on the students to find "affordable" housing, perhaps they could forgo their BMW, Mercedes, Hummer, Lexus and the alike and put the money towards housing themselves.

Further, in the May City Council Meeting it was very apparent that SDSU shirked its duty to house its student in comparison to the other colleges in the area.

In addition, SDSU needs to take responsibility for its students' housing. Providing just 3,000 more living spaces is unacceptable and it only came about due public outrage. The number of living spaces vs. the number of students is unacceptable. The long-term

I-43-1
Cont.

solution needs to focus on where students want to live. Dorm rooms are not the solution long term.

According to a SDSU's professor, students do not want to live under the University's control-dorm rooms. Housing needs to appeal to students and it **does not** have to be next to the campus. ***It does need to be in an area zoned for multi-person non-family living or apartments and not destroy the quality of life in the area or property values.*** ***SDSU's own study said the student go where they can afford it.*** PROVIDE AFFORDABLE HOUSING AWAY FROM HERE.

SDSU's master plan states "...any potential impacts associated with an expanded student body resulting in additional student use of single family homes in the surrounding community **would be speculative and, in any event, less than significant.**" (Emphases added) Past time for a reality check. None of this grand plan has broken ground and the community far and wide is outraged and galvanized because of the huge negative impact on single-family housing and quality of life because of the student population and mini-dorms. There is no speculation here it is fact right now. Less than significant? Look again. It is nearing explosive proportions. There are new construction codes, ordinances, lawsuits and Council members may lose their jobs over it.

I-43-1
Cont.

It is past time for SDSU to cease enrolling more students until it has housed the students it already has without further harming the community. Additionally, it needs to keep a cap on enrollment until the public is shown and accepts that additional students can be housed and their housing will not further destroy the neighborhood and community. Increasing the student population here to 50% of the student body (20,000 plus) will complete the destruction of this area. Its current 33% has already greatly destroyed the area.

As to the Adobe Falls area proposal, I believe the citizens who are more familiar with the area can better state the objections such as over building, access, traffic congestion, environmental concerns and inappropriate area to build.

A SDSU's professor suggested to me that because something looks nice it is ok. Over building, destroying the quality of life and devaluing property in an area or placing inappropriate housing in single-family zoned areas are not ok. *That is why we have zoning and environmental standards.*

I-43-2

Also, I object to the Alvarado plan, as building here will intensify an already overburdened and congested traffic area. Congestion on College Avenue at Interstate 8 is already terrible. The proposed addition would create a traffic nightmare. Is the intent to create more gridlock? The surface roads cannot support the influx of traffic and people that SDSU intends put here without causing gridlock and destroying the quality of life.

Additionally, widening Alvarado Road to accommodate this project will only add to the congestion, more traffic and unhealthy emissions. I heard about, but could not confirm,

I-43-3

the intent to do away with parking on at least one side of Alvarado. If this is done, where will the customers of all the businesses, renters and the condominium owners at Alvarado and 70th Street and the overflow from the medical buildings and hospital park? Are they collateral damage for the academic plan/world? Does D Z Akins, a landmark eatery, meet it demise or is it forced to move for the academic plan/world?

I-43-3
Cont.

It is not stated in the master plan, but I was told that SDSU has bought Alvarado Hospital and intends to tear it down to complete its grand academic plan/world. How the sale of a hospital can be done without the public's knowledge is very curious.

What is the impact on the community to lose a vital hospital? There are numerous senior citizens here with limited driving ability that rely on this facility as well as the doctors who are associated to practice there. By design, the doctors have their offices next to the hospital where they admit their patients. More collateral damage for the academic plan/world?

I-43-4

When the former owner, Tenet, was forced to divest itself of Alvarado Hospital for illegal billing, a study was done. This recent, about a year ago, study stated that if Alvarado did not remain a hospital, it would harm the community. The surrounding hospitals could not handle the overflow. *How does SDSU justify harming the community in this manner to enrich itself?* The academic world above all? No wonder the students feel so entitled. They practice what they learn from SDSU. Another bully blow and a below the belt one at that.

The Hotel project, I object to it. San Diego is world renown for its travel industry. Numerous hotels with the supporting eating and shopping facilities are *minutes* from SDSU. That is minutes now, unless gridlock is created by the expansion. According to the SDSU professor who spoke with me, she could see the need because other schools have on campus hotels and because it would be on the campus people would not need to go far. This me too or keeping up with the Jones idea does not work. There are just too many quality hotels *minutes* away to justify it, the expense, added congestion or land use.

I-43-5

Additionally, it is unclear where the funding for this is coming from. If it is from the public, why should the public foot the bill for a hotel to be built that is already *sold*?

Further, the ruse that it would be a teaching tool is not justified. There are just too many hotels within *minutes* of SDSU where students could be in a learning environment and be paid. Besides what is the learning difference in this *sold* hotel and one minutes away that did not cost anything?

What is the point of this expansion? According to the SDSU professor I spoke with, SDSU is in high gear to *move away from the classroom to teaching on-line*. *What are these building going to be used for? Of what value are they if teaching is via the Web? Is this a case of how nice it will look?*

I-43-6

If SDSU is not funding this project itself 100%, I am not interested in paying for it nor do I believe are most of my neighbors.

I-43-6
Cont.

It is time for SDSU to be decentralized with satellite campuses in areas with less density and zoning for single-family homes. [Per the master plan, at the time it was done, the College Area was zoned for 56% single-family homes. Per the same plan the intention is to have 50% of the student body live within one mile of the school. These are incompatible.

The Plan projects the mindset that this is the College Area and we are the College and will do what we want. SDSU's students have learned well this mindset and tell single-family homeowners the same thing. SDSU's unstated goal is that the single-family homeowners disappear. SDSU's astute students know and emulate this goal. They put it into action by destroying the quality of life and telling single-family homeowners to leave-move.

I am against SDSU's expansion. SDSU created the mini-dorm nightmare that now plagues the City and it needs to clean it up before any more students are allowed entrance. The last thing this area needs is more students, traffic, cars, congestion and pollutants. It is past time to decentralize SDSU into a less congested area with less zoned single-family homes.

I-43-7

If SDSU had not been such a long time designing bully, the citizenry would not be so galvanized against it nor distrust it so much. There exists an academic mindset/world, which generally does not include what the general mindset/world is. The academic one usually focuses on and values what enriches itself. This expansion enriches the academic mindset/world at the expense of the general mindset/world and we say no. If our no is not heard now, then it will be resounding via ordinances, building codes, lost jobs, our votes and money.

The above are my objections, but numerous neighbors have voiced them. The attached signed demand was gathered in a few hours over the weekend. There would be more signatures if more time were put into gathering signatures.

Yours truly,



Barbara Morton

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

We the undersigned insist San Diego State University cease enrolling any more students until they have housing for the students they already have. Further, keep a cap on enrollment until the public is shown and accepts that additional students can be housed and their housing will not further destroy the neighborhood and community. In SDSU's proposed Adobe Fall expansion for housing for faculty and staff it is stated, "No students will be housed at Adobe Falls" and your President has been said to say that 'faculty does not want to live next to students'. *We did not buy our homes next to students and do not want live next to them either.* SDSU has ruined the quality of life and devalued the property for the owners of single-family homes in the area.

SDSU needs to rethink its priorities and land use. With all the hotels in San Diego and surrounding areas, surely, SDSU does not need a hotel and can better use the land for say housing its students.

[illegible]

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July 24, 2007

JUL 26 2007

Lauren Cooper, Assoc. Director, Facilities Planning
Administration Bldg., Room 130
San Diego State University
5500 Campanile Dr.
San Diego, CA 92182-1624

Facilities Planning, Design
and Construction

Dear Ms Cooper,

These are comments on the draft SDSU Master Plan EIR, dated June 2007.

SDSU has become a major nuisance to its neighbors.

There is a fundamental problem at SDSU - too many students for the space available. I travel past SDSU on College Avenue a minimum of one round trip per day. During the school year, there are frequent traffic jams, sometimes extending all the way to Del Cerro Blvd on the North and past Montezuma to the South. The contrast during the present time of the year - July - is startling. At this time, there is no problem whatsoever. The problem is mainly due to SDSU! The EIR discusses various mitigation plans for which SDSU will supposedly contribute its fair share, yet the share seems very small in comparison to the share of the problem caused by SDSU!

I-44-1

A major source of the problem is at the intersection of College (N/S) and Canyon Crest (W) and Alvarado Road/East Campus Dr. (E). The problems are almost exclusively due to the East leg of that intersection which involves a messy switchback leading to Alvarado Rd. The mitigation discussed includes added lanes on College and Alvarado Rd, but nothing at all is said about the real problem which is the switchback. The turning radius is so short that most vehicles use two lanes to make the turn, which effectively makes the intersection into a single lane in each direction. Furthermore, even during July, the amount of traffic going into Alvarado Rd. is astonishing. Nevertheless this whole problem is not discussed in the EIR.

I-44-2

Figure 8-4 of the DEIR shows a traffic impact of 1040 ADT to be generated by the Adobe Falls project on the section of Mills Peak Rd. leading to the Lower Village. No mention is made of the impact due to the Upper Village, so the actual impact on the section of Genoa immediately East of Mills Peak presumably will be greater than 1040 ADT (1376 to 1442 depending on the assumptions you make about the ADT per unit). In Figure 8-4, at the extended intersection of Mills Peak/Genoa/Arno there is an indicator distributing 65% of the Mills Peak traffic to Arno and 35% to Genoa. This is a most unrealistic projection. I believe that 85% to 90% will take the Arno route. First of all, just look at a map. After a few experimental trips a new resident will find that the Arno route is the most efficient one, and thereafter his/her vehicle will virtually be programmed to take that route.

I-44-3

What you can't see on a map, is that getting on to Del Cerro Blvd. from Genoa is awkward due to the incline of Genoa and the very poor sightline from Genoa to the Eastbound traffic on Del Cerro. This adds to the reduced likelihood of taking anything other than the Arno route and justifies my estimate of 85% to 90% on Arno as opposed to the EIR estimate of 65%. These corrections (full estimate of increased traffic due to project, plus a more realistic estimate of its distribution) will almost double the increased traffic on Capri Dr. East of Arno, compared to the estimate in the EIR, which already showed a doubling compared to existing. Thus Capri Dr. would get roughly 3 times the existing traffic, a very significant impact. Arno and Capri are Low Volume Residential Local Streets and this project will increase their load to well above the rating of 700 ADT.

I-44-3
Cont.

Since the DEIR made an error (in SDSU's favor) on the ADT out of the project, presumably that error was also included in the estimate of traffic on Del Cerro Blvd. East of Capri Dr. Traffic on this section is already (before the project) greater than the rated 5000 ADT established by the Navajo Community Plan (just check it at the beginning or end of the Hearst school day). I can easily foresee serious problems for any Del Cerro resident needing emergency services during such times.

I-44-4

During presentations by Tony Fulton to the Del Cerro Action Council meant to allay our fears about the impact to our neighborhood, he cited several "restrictions" which would be included in the terms to be accepted by future "owners" of the homes in the project. However, nowhere in the DEIR do I see these "restrictions" spelled out. I want to see them written down! I don't want to be told a few years from now, that "We can't be bound by what he told you because Mr. Fulton no longer works for SDSU".

I-44-5

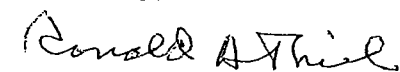
The DEIR also includes several mitigation projects intended to improve traffic flow, including some which would require widening the College Ave. bridge over Interstate 8. These could be very expensive, and because of SDSU's small "fair share" surely would be controlled by the state or the city depending on location. In such cases, SDSU could deny responsibility for inaction. I want to see that SDSU has assurance from the city and the state that these projects will be carried out in a timely manner.

I-44-6

In dealing with the possibility of alternate routes in and out of the Adobe Falls Project, the DEIR shows that many possibilities are not practical because they would excessively raise the costs to SDSU. What about the costs to neighbors and the people who use the roads including Arno, Capri Dr. and College Ave? If this project goes forward as planned, I expect the value to my home on Capri Dr. to be significantly reduced. Thus SDSU doesn't want to bear these extra costs but expects to dump them on the residents, just as it originally tried to dump all the infrastructure costs on the San Diego taxpayers.

I-44-7

Yours truly,


Ronald A. Thiel

6212 Capri Dr.
San Diego, CA 92120

cc:

Leonard Bloom
Greater Centurion Corp.
2851 Camino Del Rio South
Suite 400
San Diego, CA 92108

Senator Christine Kehoe
2445 5th Avenue, #200
San Diego, CA 92101

Assemblywoman Shirley Horton
7144 Broadway
Lemon Grove, CA 91945

Assemblywoman Lori Saldana
1557 Columbia St.
San Diego, CA 92101

Assemblyman George Plescia
9099 Mira Mesa Blvd. #130
San Diego, CA 92131

County Supervisor Dianne Jacob
Dianne.jacob@sdcounty.ca.gov

Councilmember Jim Madaffer
jmadaffer@saniego.gov

Superintendent Carl Cohn
San Diego Unified School District
4100 Normal St., #2231
San Diego, CA 92103

Board Member Katherine Nakamura
San Diego Unified School District
4100 Normal St., #2231
San Diego, CA 92103

I-45

5787 Adobe Falls Road
San Diego, CA 92120

July 24, 2007

Anthony Fulton
Director, Dept. of Facilities Design
Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Mr. Fulton,

We would like to add our names to the list of Del Cerro Residence who are concerned about the impact that the SDSU 2007 Campus Master Plan Revision (SCH No. 2007021020) dated April 17, 2007, will have on our community and especially our home. This plan will turn our secluded home into a major left/right turn for over 1,000 cars a day. *Figure 8-4*. We find the EIR lacking in details regarding the impact this much traffic would have on our street, especially in regards to the steep hill. What mitigation measures are proposed for the significant traffic impacts? Traffic bumps and no parking on the street are not acceptable alternatives.

I-45-1

We have read the EIR in detail and have concerns not only with the impact of the traffic, but also the various environmental impacts, noise, and safety issues. This project will send increased traffic by two elementary schools and make the intersection of Del Cerro Blvd and College Avenue get even worse than it's "E" and "D" rating. (*EIR, Page 3, 14-23*)

I-45-2

We are also concerned with the attitude of SDSU during the public meetings that we have attended over the last several years. The attitude is that this project will go forward if the community likes it or not, because we are SDSU and we know our plan is without fault.

I-45-3

We strongly suggest that you separate this project out of the Master Plan and go forward with the other sections that are on campus and then seriously consider the impact of this plan and delay it indefinitely.

I-45-4

Sincerely,


John and Pamela Gray

RECEIVED

JUL 26 2007

Facilities Planning, Design
and Construction

Cc:

Del Cerro Action Committee, Stephen L. Weber, Leonard Bloom, Lauren Cooper, Senator Christine Kehoe, Assemblywoman Shirley Horton, Assemblywoman Lori Saldana, Assemblyman George Plescia, County Supervisor Dianne Jacobs, Council Member Jim Madaffer, Superintendent Carl Cohn, Board Member Katherine Nakamura, Cathy Anderson

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JUL 26 2007

July 24, 2007

Facilities Planning, Design
and Construction

Mr. Anthony Fulton, Director
Department of Facilities Design, Planning and Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RE: San Diego State Master Plan, July 2007
SUBJ: San Diego State University Adobe Falls Lower and Upper Residential Villages

Dear Mr. Anthony Fulton,

Thank you for your presentations to the Del Cerro and Navajo community. We appreciate your dissemination of San Diego State University's new Master Plan and EIR.

My family and I have lived on Lambda Drive in the community of Del Cerro for the past seventeen years. We have been actively serving our community and area schools while raising our two daughters in Del Cerro. We would like to assure our family that our quality of life will not diminish due to the San Diego State University development in Adobe Falls. I am requesting that San Diego State University provide more information and rectify information presented within the Adobe Falls Residential Village Master Plan and Environmental Impact Report.

-I-46-1

I have reviewed the Draft Environmental Impact Report and have several concerns with the proposed SDSU Adobe Falls project. These concerns address planning issues, traffic congestion and community quality of life.

The SDSU Draft EIR proposes a high density development within the Adobe Falls area. This project is bordered by Interstate 8 to the south, multifamily residential units to the west and the Del Cerro community with single family residences to the north and east. The proposed access to these two villages is through the existing single family residential streets. Planning traffic access to a high density project through a low density community is contrary to common planning practices which keep safety in mind. Proper planning provides higher density residential projects adjacent to collector streets and lower density, single family residences adjacent to low volume residential local streets. This type of planning is practiced to avoid the conflict of forcing high traffic loads through an area that would otherwise have low traffic patterns. The current proposal for the SDSU Residential Villages will therefore force long time residents to endure the intense traffic that the proposed high density development will create. The implementation of this practice will severely reduce the quality of life within our neighborhood and increase risk factors for the Del Cerro community. I therefore ask that the EIR include a requirement of a separate traffic entrance to the SDSU Residential Villages other than through the neighborhood of Del Cerro.

-I-46-2

Currently, Del Cerro endures traffic delays on College Avenue due to congestion at the Interstate 8 off-ramps. With additional housing units proposed within the SDSU Residential Villages, the Del Cerro Boulevard and College Avenue intersection will have increased traffic congestion that will be dangerous and cause additional traffic delays. The EIR states that SDSU will provide its fair-share contribution of any recommended traffic mitigation. We want to make sure that not only does SDSU provide its fair-share contribution, but that the mitigation recommendations are completed by SDSU and not held in an account for later distribution. It is imperative that SDSU assures that the work is completed simultaneously during the construction of their first village.

I-46-3

Living on Lambda Drive I have serious reservations that it has been accurately classified as having a capacity of 1500 average daily trips. Currently, Lambda Drive can be congested prior to the start of school, at the dismissal of school and then during the afternoon and weekends as the sports fields are in use. Our street is dangerously congested at its current volume and should be classified as a Low Volume Residential Local Street. The street can not take any more traffic without becoming a hazard to the children of our community. I therefore request that the EIR reevaluate and reclassify the streets surrounding the Hearst Elementary School as Low Volume Residential Streets.

I-46-4

The EIR does not elaborate on how the covenants, codes and restrictions (CC&R's), that will be written for the Villages, can be modified. The community would ask that the CC&R's always be SDSU staff housing and that it never be anything other than that. We want to make sure that the SDSU Village project cannot be modified from staff housing to serve an alternate user.

I-46-5

Thank you for your attention to these details within the Master Plan and Environmental Impact Report.

Sincerely,



Douglas and Beverly Livingston
6266 Lambda Drive
San Diego, CA 92120

(619) 583-0765
dlivings2000@hotmail.com

cc: Del Cerro Action Council
PO Box 600801
San Diego, CA 92120

Governor Arnold Schwarzenegger
San Diego Office
1350 Front Street, Suite 6054
San Diego, CA 92101

Senator Dennis Hollingsworth
27555 Ynez Road, #204
Temecula, CA 92591

Senator Christine Kehoe
2445 Fifth Avenue, #200
San Diego, CA 92101

Assemblywoman Shirley Horton
Lemon Grove District Office
7144 Broadway
Lemon Grove, CA 91945

Assemblywoman Lori Saldana
1557 Columbia Street
San Diego, CA 92101

Assemblyman George Plescia
9099 Mira Mesa Blvd. #130
San Diego, CA 92131

Mayor Jerry Sanders
202 C Street, 11th Floor
San Diego, CA 92101

Council Member Jim Madaffer, District Seven
202 C Street
San Diego, CA 92101

San Diego Unified School District
Superintendent Carl Cohn
Board Member Katherine Nakamura
4100 Normal Street, #2231
San Diego, CA 92103

Leonard Bloom
Greater Centurion Corp.
2851 Camino Del Rio South, Suite 400
San Diego, CA 92108

Louis Galper
6817 Airoso Ave
San Diego CA 92120
619-287-0626

I-47

July 25, 2007

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RE: SDSU Master Plan

I'm writing to express disapproval with SDSU's planned development across the freeway from the main campus.

As a neighbor of SDSC, CSUSD, and SDSU for over 30 years while I lived on 55th Street adjacent to the campus, I have been a first-hand witness to the "paving over" of the University property, changing the campus from a comfortable bucolic environment to a series of mazes between buildings.

Mr. Fulton has an aerial photo of the University Campus. It looks more like an industrial manufacturing complex than a university.

The University administration tell us that they are forced to grow and expand to accommodate new enrollees, but the sheer volume of students and staff that now must pass thru SDSU each week is overwhelming and detrimental to the educational experience of all the students. The administration also tells us they cannot put a cap on the student population. The school is definitely maxed out—was not CSU San Marcos supposed to take the pressure of SDSU?

By this time in SDSU's history, they should have acquired the street I grew up on, 55th Street, now currently with approximately 400 apartments, this property is virtually on campus.

Rather than expand off campus to the property across the freeway, I think SDSU should put a cap on further expansion and on further enrollments. This will better serve the educational purpose of the University and the surrounding campus neighborhoods.

Sincerely,

Louis Galper

Louis Galper
SDSU class of 1975

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JUL 26 2007

Facilities Planning, Design
and Construction

I-47-1

I-48

July 25, 2007

Lauren Cooper, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RE: SDSU 2007 Campus Master Plan EIR

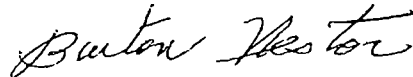
Dear Ms. Cooper:

I am writing to comment on the Draft EIR for the 2007 Campus Master Plan Revision. This document provides a thorough analysis of the issues and impacts that could result from SDSU's future development.

Of particular interest to me is the Adobe Falls Faculty and Staff Housing project. I was pleased to see that SDSU has substantially reduced the density of this project. The new proposal is much more realistic than the prior plan, and appears to cause minimal traffic impacts on Del Cerro.

I am glad that SDSU listened to the community's concerns and made this project a better fit for the community.

Sincerely,



Burton Nestor

RECEIVED

JUL 25 2007

Facilities Planning, Design
and Construction

I-48-1

PUBLIC COMMENT REGARDING PROPOSED INCREASE OF STUDENTS
TO CAMPUS AND NEIGHBOURHOOD (7.25.07)

TO: SDSU OFFICIALS, via:

Anthony Fulton
Division of Business & Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

I am very concerned with the seemingly unmanageable increase in number of students that will be coming to campus and invading the neighbourhoods.

I've been living in College Estates for 17 years and even within the past 2 years there has been a deterioration of the quality of life in the neighbourhood brought on by too many students in mini-dorms (e.g., increased noise, traffic, litter, police action).

I-49-1

During your deliberations, please consider:

- Taking more radical steps to reduce and control mini-dorms
- Increasing adequate on-campus housing on the east side of campus
- Developing a quality bike trail system so students can actively safely bicycle to campus (include safe storage facilities on campus, too)
- Putting an under pass or over pass on 55th street (near the ARC and Peterson Gym).

I-49-2

I-49-3

I-49-4

Thank you for your attention.

Thomas L. McKenzie, Ph.D
5127 Walsh Way, San Diego, CA 92115

619-287-9521



Facilities Planning, Design
and Construction

JUL 25 2007

RECEIVED

July 23, 2007

RECEIVED
JUL 27 2007
Facilities Planning, Design
and Construction

ANTHONY FULTON, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Dear Anthony Fulton:

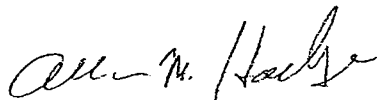
We have been living in Del Cerro for 47 years. We do not like any more traffic on College Ave. When I go to work I have to turn right from Del Cerro Blvd. onto College Ave. Now, during the time classes are in session, sometimes I have to wait for the signal twice. We do not want any more traffic in our neighborhood. When I finally get onto College Ave. I have to wait for the longest time to get to the freeway. I don't want to wait any longer than I have to.

I-50-1

Please figure something else out for your expansion plans. Don't you have enough room on campus to do what you want? Isn't there something you can do on campus?

I-50-2

Sincerely,



Allan M. Hodge

I-51

RECEIVED

JUL 27 2007
Facilities Planning, Design
and Construction

24 July 2007

Mr. Anthony Fulton
Director Department of Facilities Design
Planning & Construction Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 02182-1624

Dear Sir:

I remain concerned at your relative unresponsiveness to the concerns raised in previous letters concerning errors, omissions, and distortions of fact in your EIR and master plan for the University. It is obvious that you (personally) or the President of the University do not intend to live down in Adobe Falls. If you did, you would pay more attention to the comments from the Del Cerro residents.

The EIR does acknowledge that Del Cerro Blvd currently operates past the maximum desirable capacity. Yet you continue to propose adding an additional 20 percent traffic. This is unsatisfactory. If you must build down there by the Falls, at least provide another entrance. Don't imperil the safety of the children attending Phoebe Hearst and Temple Emanu-El any more. (I live across from Phoebe Hearst and have seen far too many near misses.)

I-51-1

The traffic delays now at the corner of Del Cerro Blvd and College Avenue (EIR, p. 3.14-23) during peak hours of the day should not be further exacerbated. Frustrated drivers become further traffic and safety hazards. Don't add to what already exists.

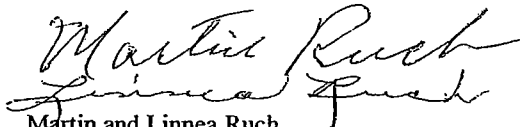
The revision to the EIR admits that SDSU can purchase mitigation uplands to mitigate the environmental impacts they will cause by building in the Adobe Falls area. It would be better for all concerned to use those funds to buy a more suitable property initially and preserve the natural lands now existing in Adobe Falls. If I were a prospective faculty member, I would not want to live down in that area!

I-51-2

If, as the EIR states, Adobe Falls and trails are restored; what additional traffic will be generated and what impact will this further add to Del Cerro Blvd and College Ave?

I-51-3

Sincerely,



Martin and Linnea Ruch
6225 Del Cerro Blvd
San Diego, CA 92120

CC:

Mr. Leonard Bloom
Greater Centurion Corp.
2851 Camino Del Rio South
Suite 400
San Diego, CA 92108

Senator Christine Kehoe
2445 5th Ave, #200
San Diego, CA 92101

Assemblywoman Shirley Horton
7144 Broadway
Lemon Grove, CA 91945

Assemblywoman Lori Saldana
1557 Columbia Street
San Diego, CA 92101

Assemblyman George Plescia
9099 Mira Mesa Blvd #130
San Diego, CA 92131

Governor Arnold Schwarzenegger
San Diego Office
1350 Front Street, #6054
San Diego, CA 92101

County Supervisor Dianne Jacob
250 E. Main St.
El Cajon, CA 92019

Councilmember Jim Madaffer
San Diego City Hall
202 C Street
San Diego, CA 92101

San Diego Unified School District
Superintendent Carl Cohn and
Board Member Katherine Nakamura
4100 Normal Street, #2231
San Diego, CA 92103

Barbara Teemsma
5534 Trinity Way
San Diego, CA 92120

July 25, 2002

Mr. Anthony Fulton
Department of Facility Design
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RECEIVED
JUL 27 2002
Facilities Planning, Design
and Construction

Dear Mr. Fulton,

My husband and I moved to Del Cerro in 1967. Our six children, two foster children and two grandchildren have lived here and attended Phoebe Hurst Elementary School. Over the years we have seen a gradual increase in traffic problems. Traffic around the school has increased dramatically as many more working mothers are dropping off their children at school before traveling on to work. There are also school busses that bring children in from other communities that clog up the two-lane road in and out of Del Cerro. The Temple Emanu-El School across the street has had a big increase in students and most of them also rely on parental transportation to get to school.

As our children went on to Lewis Jr. High and Patrick Henry, the traffic on College Avenue became another early morning frustration, as we needed to drive them to school. I usually did the school carpool run, while my husband left for work traveling from our home on the west end of Del Cerro Blvd., to College Ave., and on to I-8 West. A metered stop light is installed at the entrance to I-8, going east and west, but traffic is always backed up to College Avenue every morning as people are getting off to work.

I can't imagine a worse place to put a big condo project than the proposed area of Adobe Falls. There is only one way to get in and out of there every day. The streets are narrow, the cars of residents in the proposed condos would have to pass in front of the schools to get out no matter where they were going. I am concerned about the safety of the children, whether they are walking, crossing the street, riding bikes, taking the bus, or being driven by parents. And, what about the hundreds of cars just trying to get out of Del Cerro to get to work and various other destinations everyday, that have to use Del Cerro Blvd. to get there. The same traffic problems exist on College Avenue and on Del Cerro Blvd. as residents return home again.

I am 100% against the condo project being proposed. Please be realistic about the number of cars, people, and children your project will impact. The problems your building projects will cause to our Del Cerro Community are huge.

Sincerely,

Barbara Teemsma
Barbara Teemsma

I-52-1

I-52-2

Michele Nash-Hoff
P. O. Box 600505
San Diego, CA 92160

July 25, 2007

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RECEIVED
JUL 27 2007
Facilities Planning, Design
and Construction

Dear Mr. Fulton:

As a resident of Del Cerro, I am writing to express my concerns about the Adobe Falls Project and point out some inaccuracies in the EIR.

1. SDSU has again misclassified the streets in Del Cero. The EIR states they have a capacity of 1500 ADT. According to data provided by the City of San Diego, the streets of Arno, Genoa, Capri, Adobe Falls Road, Rockhurst and Lambda are classified as Low Volume Residential Local Streets, with a capacity of only 700 ADT per day.

I-53-1

2. The EIR invents levels of service (LOS) for our residential streets and claims these are found in the San Diego Roadway Classification Manual and LOS Table. This is absolutely not true as residential streets have no LOS rating. This is because their primary purpose is to serve abutting lots and not to carry through traffic from one place to another. I demand that SDSU acknowledge these LOS levels are fictitious and misleading and that they be removed from the EIR. I demand that SDSU conduct an impacts analysis based on the percentage or magnitude of the increase in traffic volumes of these streets as they propose increases of more than 100%, and this certainly constitutes a significant adverse impact to local residents, pedestrians and bicyclists.

I-53-2

3. The EIR acknowledges Del Cerro Blvd's maximum desirable capacity, per the Navajo Community Plan, is 5,000 ADT. It also acknowledges Del Cerro Blvd is currently operating past that capacity by 170 ADT. I demand that SDSU acknowledge that any amount of additional traffic on Del Cerro Blvd constitutes a significant adverse impact, which must be mitigated or avoided since this is the only means of access/egress to the homes west of College Avenue. Any further increase in traffic would adversely impact the safety of residents and schoolchildren attending the schools at Phoebe Hearst and Temple Emanu-El.

I-53-3

4. In addition, the intersection of Del Cerro Blvd and College Avenue already operates at unacceptable LOS of "E" in the peak morning hours and "D" in the peak afternoon/evening hours. (EIR, p. 3.14-23) Any amount of additional traffic there constitutes a significant adverse impact, particularly in light of its unique location -- the only means of access/egress to the homes west of College Avenue, and the primary means of access/egress for parents/children attending Phoebe Hearst/Temple Emanu-El schools. Any amount of additional traffic poses safety hazards and necessarily diminishes emergency access/response times during those peak hours.

I-53-4

RECEIVED
JUL 27 2007
Facilities Planning, Design
and Construction

July 26, 2007

Anthony Fulton, Director
Dept. of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Dear Anthony Fulton,

Do you live in the community of Del Cerro or use the College Avenue bridge over Interstate 8 daily? If you do, you would clear the misclassification in the Environmental Impact Report ("EIR") of the following:

I-54-1

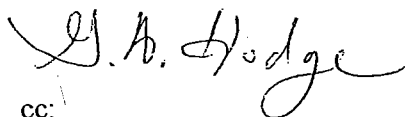
1. Your neighborhood streets of Arno, Genoa, Capri, Adobe Falls Road, Rockhurst and Lambda from 1500 ADT to 700 ADT per day.
2. Your residential streets have no LOS rating.

Please present a honest, true "EIR" to all concerned so we all can intelligently move forward in making sound decisions.

I-54-2

Sincerely,

Gerry A. Hodge


cc:

Leonard Bloom
Councilmember Jim Madaffer
Board Member Katherine Nakamura

I-55

July 26, 2007



Lauren Cooper, Director
Department of Facilities Design, Planning & Construction
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Dear Ms. Cooper:

As a resident who lives near San Diego State University, I've been monitoring the environmental review process the university has been conducting over the past few months. This process and how SDSU addresses student housing is of major importance to me.

For this reason, I'm happy to see that SDSU has made changes to the 2007 Master Plan to respond to this important issue in our community. The addition of almost 3,000 beds to the Campus Master Plan will certainly help alleviate neighborhood impacts, and focus student activity closer to the campus. The revisions made by the university to the plan to address concerns voiced by the community are greatly appreciated.

I-55-1

I am encouraged to see SDSU making efforts to house more students on and near campus as well as promoting the use of the trolley. If more students use the trolley, it helps relieve traffic congestion and parking demand in the community.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Jean Ashour".

Jean Ashour

Eleanor W. Lynch, Ph.D.
5260 Remington Road
San Diego, CA 92115-1139

July 26, 2007

Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RECEIVED
JUL 27 2007
Facilities Planning, Design
and Construction

Dear Mr. Fulton:

The following comment responds to Section 3.12.6 of the Draft Environmental Impact Report. The section is presented in bold and comments follow in italics.

3.12.6 CUMULATIVE IMPACTS

The proposed project, in combination with other housing projects planned in the SDSU vicinity over the near- and long-term, would provide adequate housing for the additional students, faculty and staff that likely would reside in the area with project implementation. Therefore, the proposed project impacts would not be cumulatively considerable and the project would not result in potentially significant cumulative impacts to population and housing.

I-56-1

The number of students is projected to increase 34% in the years between 2006-07 and 2024-25. The number of housing units planned for students will in no way accommodate this increase. In fact, some of the "additions" cited in the report are already student facilities that the university intends to acquire resulting in no net gain. *Suggesting that there will be no cumulative impacts in an area that is already in litigation and dispute with the university over minidorms and rooming houses in surrounding neighborhoods is false and misleading. Increases in students residing in minidorms/rooming houses in the surrounding residential neighborhoods have the following impacts: additional noise, litter, traffic, drug and alcohol use, and unsafe driving.*

I-56-2

Although the report lists current mitigations and ordinances, these measures are not working with the current student population. Assuming that their effectiveness would increase with a 34% increase in the student body is highly unlikely, if not impossible.

I would also like to comment on the input requested of neighbors in the preparation of this report. As a resident of College View Estates which adjoins the Western boundary of SDSU, I received the same, single-page input survey twice. Each one asked me to make one of two choices: did I approve the plan or


I-56-3

did I need more information. As a retired, SDSU faculty member, I was appalled that SDSU would allow such a document to be mailed and considered a legitimate survey. There were no options for disagreement or expression of concern among the choices. As a result of this form of polling, I do not believe that any survey results suggesting that neighbors support the plan can be considered to be valid.

I-56-3
Cont.

Thank you for your attention to these concerns.

Sincerely,

A handwritten signature in cursive script that reads "Eleanor Lynch".

Eleanor W. Lynch, Ph.D.

cc: College View Estates Association

Anthony Fulton, Director
 Dept. Of Facilitator Design, Planning & Construction
 Div. Of Business & Financial Affairs
 SDSU
 5500 Campanile Dr
 San Diego, Ca 92182-1624

RECEIVED
 JUL 27 2007
 Facilities Planning, Design
 and Construction

Dear Mr. Fulton:

Although SDSU's most recent plan is more acceptable than the first, there continues to remain several issues important to me.

1. Traffic. The EIR continues to misclassify our local streets. It says that our local residential streets can carry 1500 ADT. However, my street and neighboring ones are low volume residential streets that carry a capacity of 700 ADT.

I-57-1

2. Traffic and two elementary schools. Del Cerro Blvd already exceeds its ADT by 170. Adding more traffic past these two schools lowers the safety level.

I-57-2

3. Traffic and false classification. The EIR invents levels of service for residential streets. Residential streets have no LOS because they are meant for local traffic only. The result of this faulty classification is to more than double the traffic on our local streets.

I-57-3

4. Traffic and the intersection of Del Cerro Blvd and College. This intersection is already operating at unacceptable LOS levels of E and D. Any additional traffic poses safety hazards to the two elementary schools. Adding an additional right turn lane (mentioned at a meeting) might help move traffic but would have limits. It is not safe to turn right on red because of limited visibility caused by the hill on College just north of the intersection.

I-57-4

5. Traffic. The EIR suggests the use of a minivan will lessen traffic by 10%. As much as new trails and shared recreational facilities might be a plus for the general community. This could more than undo the 10%. The EIR does not address the potential of outside traffic using these facilities.

I-57-5

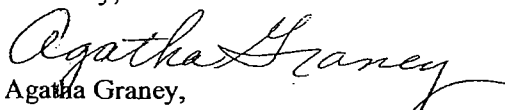
6. Environment. I am concerned for the natural habitat and waterfall area that is so unique. Will we lose our local falcons and other wildlife? I ask for a full biological impact study.

I-57-6

7. The desirability of the project's product. I am a realtor. Today I visited two homes that might better meet the needs of your faculty. I visited a very nice 4 bedroom condo for \$385K near Margerum and Mission Gorge and a 3 bedroom house in 92119 for \$425K. I don't see how crowded housing near a busy freeway would be more enticing. I offer my services to prospective faculty or to your committee to help find suitable housing for incoming recruits. As a former educator and college grad, I understand that your faculty values good schools. Both of these homes and many others under \$450K attached and detached are within the Patrick Henry area.

I-57-7

Sincerely,


 Agatha Graney,
 6142 Arno Dr.

I-58

From: Suzanne D. Schumacher
6160 Arno Dr.
San Diego, CA 92120-4647
tel:619-583-5524
E-mail: sudbud@sbcglobal.net

To: *Mr. Anthony Fulton*
Lauren Cooper

RECEIVED
JUL 27 2007
Facilities Planning, Design
and Construction

Dear Mr. Fulton, Dear Ms. Cooper,

As a 46 year resident of Del Cerro I object to the plan for building 170 units for SDSU faculty/staff housing. Construction will go on for years since it's being done in two phases, and our residential streets can't handle it—they are narrow, steep, and winding. The width of these streets is only 33 ft across with at least 12 feet of this space used for parked homeowners cars, leaving only 21 feet for passing cars. Heavy construction trucks will barely make it through in single file. Over the years we have had parked cars on our street run into, and our neighbor's car was totalled by a service vehicle in broad daylight a couple of weeks ago. This building project could result in danger to school age children and residents backing out of driveways onto curved roads full of traffic with poor visibility.

I-58-1

I-58-2

Del Cerro Blvd. and College Ave. already are overloaded. Going east on Highway 8 sometimes results in a 10 minute delay to cross the bridge. Adding 1200 more care trips per day will be disastrous, especially for emergency vehicles.

I-58-3

This neighborhood of 50 years does not deserve to be demolished and made undesirable for our current and future homeowners.

I-58-4

Please do not allow this to occur.

Thank you for your attention.

Sincerely, *Suzanne D. Schumacher*
Suzanne D Schumacher

I-59

7/27/07

Lauren Cooper, Director
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RECEIVED
JUL 27 2007
Facilities Planning, Design
and Construction

Dear Ms. Cooper:

I am a resident of the College Area and have been following the Campus Master Plan Revision process.


I have noticed since the trolley started serving SDSU, traffic around the campus has decreased. Clearly, the trolley has made a difference. Does SDSU have plans to do anything further to continue to promote the trolley as a way to get to and from campus? How has the trolley impacted parking on campus?

I-59-1

I am happy to have SDSU in my community, and feel that its growth, if well managed, can be an asset to our neighborhood and San Diego.

I-59-2

Thank you,

Rick Dallin
 Rick Dallin
4396 Cartagena Dr
San Diego, CA 92115

PN: 619-265-7425

July 25, 2007

Anthony Fulton
Division of Business & Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

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Facilities Planning, Design
and Construction

RE: Draft DEIR, SDSU Expansion

Dear Mr. Fulton:

Please consider this letter as a response to the DEIR for the Campus expansion.

Our primary concern as a member of the College Area community is in regard to the DEIR's lack of concrete analysis regarding how University controlled housing will be provided. SDSU's "...goal to house more than 25% of its students..." seems highly speculative.

As members of a community where the student housing, nightmare is well-documented, we need more precise remedies addressed in the DEIR in order to solve the student housing crunch resulting from the University expansion.

Very Truly Yours,


Frank & Zoila Gudgell
5173 Leo Street
San Diego, CA 92115

I-60-1

July 27, 2007

5111 Manhasset Dr.
San Diego, CA 92115

Mr. Anthony Fulton
Facilities Design, Planning & Construction
Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182

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JUL 27 2007
Facilities Planning, Design
and Construction

Dear Mr. Fulton,

As emeritus faculty and College Area residents we have considerable interest in SDSU's expansion plans. We understand the need for expansion, but have the following concerns.

1. Assumed enrollment increase is unrealistic

SDSU can barely manage the current enrollment let alone significant increases, as our impacted status recognizes. The proposed physical plant growth is needed to meet current enrollment.

Increased demand for a CSU education is unquestionable. The question is how to accommodate it. Several CSU campuses, including SDSU, are at or above capacity. Other campuses have considerable room for expansion. For example Sonoma, Stanislaus, Humboldt and Dominguez Hills have less than 10,000 students on campuses nearly as large as ours or larger. Before packing 11,000 + more students into overcrowded (even with new facilities) campuses the other campuses need to be built to similar capacity first. Students may not get their first choice (they don't now) but there will be space.

If SDSU must expand by 11,000+ students it should be at a satellite campus in South Bay. The previous attempt was a joke, bound to fail. This needs to be serious, a place where students can complete a popular major with supporting upper division GE; business and liberal studies are likely choices along with teacher education.

I-61-1

2. Infrastructure mitigation.

A. Fair Share. SANDAG's estimated College Area population increase is clearly based on increasing student population. There is no explanation for the disparity between Navajo Community growth (8%) and College Area Community growth (48%) other than SDSU growth. Assuming similar growth in the two communities SDSU accounts for over 80% of growth. SDSU's fair share of mitigation expense should therefore be sizeable. Twenty percent does not reflect a fair share of costs; only 15% of mitigation projects are at this level and many are at the unrealistic level of 1-2%. A major reason for earlier suits against the university was unwillingness of San Diego taxpayers to pay for SDSU expansion.

I-61-2

B. Mitigation first. Given the lack of funds at both the city and state level, mitigation funding may be difficult to obtain. No major addition should commence before mitigation funding is in place. Failure to do so is likely to result in very late or no mitigation. However, one could build office/class in Alvarado, for example, but not the parking essentially eliminating the need for road mitigation.

I-61-3

3. Student Housing Impact

We greatly appreciate the doubling of proposed on campus housing and SDSU's plans to manage privately owned apartment complexes. Nevertheless, the EIR statement "...the project would not result in potentially significant cumulative impact to population and housing." (3.12.6) is ludicrous. Adding 11,000+ students and over 1,000 faculty and staff to the residents and users of the community is a population impact regardless of how handled. Proposed housing estimates include some projects which have been cancelled as we understand it (Sorority row) or are on indefinite hold (Paseo). It gives no indication of how many students might be displaced if the proposed Rooming House Ordinance prohibiting large commercial rentals goes into effect.

I-61-4

4. Parking and transportation

On campus parking should not be significantly increased, and EIR indicates it will not be. In addition, better financial incentive for trolley and bus is essential. At UCSC, UCSB and other campuses student ID provides free transportation; this should be explored. At a minimum students should get a significantly reduced fare, at least equal to the youth monthly pass.

I-61-5

5. Hotels

The DEIR lists two future hotels. This does not seem reasonable; one is an important Contribution, but not two.

I-61-6

Sincerely,



Don and Ann Cottrell

July 27, 2007

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Facilities Planning, Design
and Construction

Mr. Anthony Fulton
Division of Business and
Financial Affairs

Dear Mr. Fulton:

My husband and I are graduates of San Diego State University and very proud of the excellence in education that the University has been able to uphold during the last few decades. My husband holds a B.A. and M.A. in electrical engineering and an M.A. in business administration from S.D.S.U. I hold a B.A. and an M. A. in Music from S.D.S.U. Our daughter is now attending S.D.S.U. and we hope that the educational standards we experienced will be continued. We are concerned about the proposed increase in students attending S.D.S.U. and believe that it will cause the university to become less efficient and the educational excellence of the university to be compromised.

I-62-1

The enrollment when we attended S.D.S.U. was approximately thirty-thousand and it was overwhelming at times for the administration. Now that S.D.S.U. has added the San Marcos campus it might prove a wiser use of funds to increase its enrollment and its buildings, rather than make S.D.S.U. become over-crowded and create a problem for the existing communities near the university.

I-62-2

I believe that part of the problem may be caused by students enrolling in fewer units and still considered full-time. Perhaps the university could develop incentives to have the students complete their undergraduate degrees in five years and not impact the S.D.S.U. area for more than the anticipated years for completion. The university may need to exert more control on the fraternities and sororities to reduce the hours spent in activities and increase the likelihood of the students becoming serious about completing their degrees in four to five years. Perhaps the university should not support the sororities or fraternities in any way or completely abolish them. Our daughter joined a Christian sorority and it has undermined her study habits to the point that she is on academic probation at the present time. Many students are wasting one or two years at S.D.S.U. because of the atmosphere in the dormitories and the sororities and fraternities.

I-62-3

There is also concern in the community as to the impact of the proposed building of dormitories and condos next to Waring Road. It would cause extreme traffic problems to have thousands of students living in an area that already experiences long delays on the freeway presently. The university has experienced a great increase in the number of students who attend from out of the San Diego area and if this could be reversed it would alleviate the need for more dormitories. We believe that it would be more beneficial to San Diego State University and the surrounding communities to maintain the present level of enrollment and expand the San Marcos campus. Thank you for your consideration of the above suggestions.

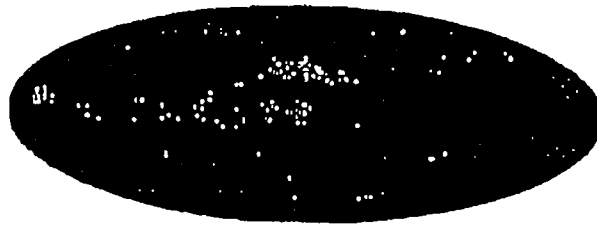
I-62-4

Sincerely,

Mrs. Wayne E. Richards

Attn: Laurie Cooper

I-63



Anthony Fulton
Department of Facilities Design, Planning & Construction
Division of Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Dear Mr. Fulton:

As a business owner adjacent to SDSU, I am very interested in their plans for future growth. The ability of SDSU to continue providing access to higher education is critical to San Diego's continued success. SDSU has provided opportunity to a lot of young people who might otherwise not have gone to college.

Over the years, I have noted that the campus seems to be shifting to a more residential population, rather than a commuter population in the past. More students are living closer to campus, and neighbors have raised some concerns not considering the larger benefits to the community at large. For this reason, I was pleased to see that SDSU has added substantially more student housing to its plan for the future. This will help meet increasing demand for student housing and give students greater opportunity to have a "traditional" campus experience.

I hope SDSU will do whatever it can to encourage students to take advantage of this new university housing and of course to also support high quality establishments like ourselves, to keep the focus on a vibrant campus that is a real long and short term asset to the community.

Sincerely,

Steve Rice, CEO
Paradise Yogurt
div. Of QuantumWorks Corporation
<http://ParadiseYogurt.com>

I-63-1

PARKER · STANBURY LLP

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* MEMBER OF AMERICAN BOARD OF TRIAL ADVOCATES

THOMAS L. WADDELL, OF COUNSEL

HARRY D. PARKER (1891-1976)
RAYMOND G. STANBURY (1904-1966)

July 26, 2007

RECEIVED

JUL 30 2007

San Diego State University
Division of Business and Financial Affairs
Attn.: Anthony Fulton, Director
Department of Facilities Design, Planning & Construction
5500 Campanile Drive
San Diego, CA 92182-1624

Facilities Planning, Design
and Construction

Dear Mr. Fulton:

Re: Ronald and Billie Withem
6151 Capri Drive
San Diego, CA 92120-4648
Objection to SDSU North Campus Project
Our File No.: 1972373

Please be advised that this office has had a consultation with Ronald and Billie Withem regarding the above-referenced matter and they have requested this letter be sent to you on their behalf.

Mr. and Mrs. Withem hereby object to the action by San Diego State University (SDSU) in filing for permits to build 172 high density condominiums in Adobe Falls on the following grounds:

1. The Environmental Impact Report (EIR) never fully addresses potential adverse traffic and safety impacts to Adobe Falls Road. In figure 8-4, the EIR states 1040 Average Daily Trips (ADT) will be generated by the project. However, these numbers are never again mentioned or included in a significant impact analysis. If they were residents on Adobe Falls Road, they would demand that SDSU do a full disclosure and analysis of the impacts to that street and ask what mitigation measures you propose for the significant traffic impacts there, particularly in light of the existing uniquely sloped grade. I-64-1
2. The EIR states SDSU will purchase mitigation uplands to mitigate the environmental impact they will cause by building in the Adobe Falls area. They would ask SDSU to explain how it has the power to purchase these lands, but yet, does not have the power to purchase property elsewhere which would be more suitable for faculty/housing and would not disturb a sensitive environmental habitat for various species of plants and animals. I-64-2
3. SDSU has misclassified their streets and the EIR states they have a capacity of 1500 ADT. As community members of Del Cerro, they would insist that the streets of Arno, I-64-3

ORANGE COUNTY

200 WEST SANTA ANA BOULEVARD
SANTA ANA 92701-7502
(714) 547-7103
FAX (714) 547-3428

SAN BERNARDINO

306 WEST SECOND STREET
SAN BERNARDINO 92401-1805
(909) 884-1256
FAX (909) 888-7876

SAN DIEGO

3131 CAMINO DEL RIO NORTH
SAN DIEGO 92108-5708
(619) 528-1259
FAX (619) 528-1419

SACRAMENTO

777 CAMPUS COMMONS ROAD
SACRAMENTO 95825-8309
(916) 565-7651
FAX (916) 929-0448

\\psserver2\data\$_wpd_\Attorneys\Patrick Hevesy\Withem-L1(Ronald)1972373.doc

Genoa, Capri, Adobe Falls Road, Rockhurst and Lambda are Low Volume Residential Local Streets, with a capacity of only 700 ADT per day.

I-66-3
Cont.

4. The EIR invents levels of service (LOS) for their residential streets and claims these are found in the Dan Diego Roadway Classification Manual and LOS Table, which is absolutely NOT TRUE. Residential streets have no LOS rating. This is because their primary purpose is to serve abutting lots and not to carry through traffic from one place to another. They would demand that SDSU acknowledge these LOS levels are fictitious and misleading and that they be removed from the EIR. They would further demand that SDSU conduct an impacts analysis based on the percentage or magnitude of the increase in traffic volumes of these streets as it proposes increases of more than 100% and this certainly constitutes a significant adverse impact to local residents, pedestrians and bicyclists.

I-64-4

5. The EIR acknowledges Del Cerro Blvd.'s maximum desirable capacity, per the Navajo Community Plan, is 5,000 ADT. It also acknowledges Del Cerro Blvd. is currently operation past that capacity by 170 ADT. They would demand that SDSU acknowledge that ANY amount of additional traffic on Del Cerro Blvd. Constitutes a significant adverse impact which must be mitigated or avoided, particularly because this is the only means of access/egress to the homes west of College Avenue, and because it adversely impacts the safety of residents and schoolchildren attending the schools Phoebe Hearst and Temple Emanu-El.

I-64-5

Therefore, you are to contact Mr. and Mrs. Withem with reference to the above concerns and make arrangements to bring this matter to an amicable resolution. This office has informed Mr. and Mrs. Withem of their legal rights and remedies, in the event you fail to take action to resolve her concerns.

This correspondence is as a result of information and/or documentation provided by Mr. and Mrs. Withem and a reply is expected. You are authorized, requested, and directed to send your reply, comments, or correspondence directly to Mr. and Mrs. Withem at the following address: 6151 Capri Drive, San Diego, California 92120-4648 within **ten (10) days** of the date of this letter.

I-64-6

We appreciate your expeditious attention to this matter and hope that a resolution can be worked out amicably.

Very truly yours,

PARKER · STANBURY LLP

By


PATRICK M. HEVESY

cc: Mr. and Mrs. Withem

No Recipient, Fwd: Comments: Draft EIR for the 2007 Campus Master Plan Revision

To:
 From: Lauren Cooper <cooper12@mail.sdsu.edu>
 Subject: Fwd: Comments: Draft EIR for the 2007 Campus Master Plan Revision
 Cc:
 Bcc:
 Attached:

Return-Path: <lkilroy@mail.sdsu.edu>
 Received: from lkilroy205@mail.sdsu.edu ([130.191.18.8])
 by mail.sdsu.edu (MOS 3.8.3-GA)
 with ESMTP id BAK67936;
 Fri, 27 Jul 2007 13:01:16 -0700 (PDT)
 Message-Id: <6.1.2.0.2.20070727105628.0203eb18@mail.sdsu.edu>
 X-Mailer: QUALCOMM Windows Eudora Version 6.1.2.0
 X-Priority: 1 (Highest)
 Date: Fri, 27 Jul 2007 13:01:15 -0700
 To: afulton@mail.sdsu.edu
 From: Linda Kilroy <lkilroy@mail.sdsu.edu>
 Subject: Comments: Draft EIR for the 2007 Campus Master Plan Revision
 Mime-Version: 1.0
 Content-Type: multipart/alternative;
 boundary="===== _685262140==.ALT"
 X-Junkmail-Status: score=10/50, host=mail.sdsu.edu
 X-Junkmail-SD-Raw: score=unknown,
 refid=0001.0A090206.46AA4F0C.00A8-A--VTL=0,
 ip=130.191.18.8,
 so=2006-12-09 10:45:40,
 dmn=5.1.5/2006-01-31

As a resident in the College Area (Art St, between Messita and Catoctin), I have serious concerns about the lack of student housing in this area and the resulting impact caused by the sprouting of "mini-dorms" in single-family residential neighborhoods. I also have concerns about the traffic and parking impacts. My comments are related to these issues.

Section 3.12 - Population and Housing

Comment 1: The University needs an active and comprehensive marketing and public information program to assist students in finding housing near bus and trolley routes/stops. Such a program could reduce the demand for housing in the immediate areas of the campus impacted by the recent proliferation of "mini-dorms."

Comment 2: How has the demise of the Paseo Project affected earlier projections of available student housing? Has the proposed but not evaporated housing been taken into account in your new projections?

Comment 3: It is appropriate that SDSU should provide data showing the number of students currently living in single-dwelling units in the College Area and the number of units that have been

I-65-1

I-65-2

I-65-3

converted to "group housing" over the last 5 years.

I-65-3
Cont.

Comment 4: How was the conclusion in (3.12-23) reached that states "... any potential impacts associated with an expanded student body resulting in the additional use of single-family homes in the surrounding community would be speculative and, in any event, less than significant."? Obviously, the persons who came to that conclusion are not living next to a previous single-family home that has since been converted to a mini-dorm. Nor are those persons living in a neighborhood or on a street where many home have become dormitories. There is absolutely NOTHING speculative about an expanded student body resulting in the additional use of single-family homes in the area surrounding SDSU given the theory that past behavior is indicative of future behavior. As long as there are greedy developers willing to ruin neighborhoods for their personal profit (and there is nothing speculative about that, either), the trend will continue. Unless, of course, the city takes strong measures to prevent that from happening. It is a fact that, as long as living in single family housing is more economical, students will pursue this option in lieu of renting new and expensive apartments.

I-65-4

Comment 5: SDSU has commissioned a housing demand and market study, scheduled for release in Fall 2007 (3.12-15). The final EIR should not be prepared until the results of this study can be incorporated.

I-65-5

Comment 6: In the section regarding measures to control nuisance rental properties (3.12-21), it is incorrectly stated that City of San Diego Municipal Code Section 59.5.0502 regulates "music or crowds clearly audible 50 feet from a sensitive receptor's property line between the hours of 10:00 p.m. and 8:00 a.m." That code section only applies to amplified sound. Loud talking, shouting, and "party sounds" that are not amplified music, but that are just as effective in keeping awake persons in neighboring properties, are not covered by that code. On the other side of the issue, you might want to include the proposed Rooming House Ordinance in the list of possible mitigation measures for nuisance rental properties. Lastly, SDSU would be prudent to consider imposing it's own sanctions against students who are creating such a public nuisance that police must be called to intervene.

I-65-6

Section 3.14 – Transportation/Circulation and Parking

Comment 7: The Traffic Technical Report (3.14-20) assumes a static automobile/ pedestrian circulation pattern. SDSU's automobile/pedestrian circulation is unlike other standard uses. The DEIR is unclear as to how many and what time the traffic study's traffic counts occurred in September 2006 and February 2007. It is also unclear (and not discussed) how pedestrians impact vehicular circulation. The impact of pedestrians on traffic flow is particularly significant on Montezuma Road and College Avenue adjacent to the campus. Analysis should include detailed discussion of these variations in the College Area's circulation patterns. Pedestrian circulation and its interaction with traffic patterns should be fully analyzed. Mitigation should include timely synchronization of traffic lights to improve automobile and pedestrian circulation. Already the impact is disruptive with left-turn lights lasting only long enough to let 3 or 4 cars through when there is a line of cars extending beyond the previous intersection waiting in the left-turn lanes.

I-65-7

Comment 8: Section 3.14.14, "Level of Significance After Mitigation," states that the project would result in significant and unavoidable impacts to "College Ave. / I-8 interchange, Montezuma Rd. (between Fairmount Ave. to Collwood Blvd.), Alvarado Rd. (between East Campus Drive to

I-65-8

70th St.), and I-8 (between Fairmount Ave. to Fletcher Parkway.)” The project’s ability to contribute its fair share to the impacts is dependent on funding from the State Legislature. If the Legislature is unable to *guarantee* adequate funding to mitigate project impacts, the scope of the project should be reduced accordingly.

I-65-8
Cont.

Comment 9: Identify the specific intended mitigation measures to be taken to provide for the additional traffic on Alvarado Road that will be generated by the hotel, new academic buildings and parking structure, including the impacts on the Alvarado Road/College Avenue and Alvarado Road/70th Street intersections.

I-65-9

Comment 10: Increasing the number of lanes on Alvarado Road between Reservoir Drive and 70th Street would require the removal of on-street parking currently utilized to capacity by the multi-family developments along Alvarado Road. No viable mitigation measure is proposed for this significant impact.

I-65-10

Linda Kilroy, M.A.
Dissertation & Thesis Reviewer
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thesisreview@mail.sdsu.edu
<http://www.sdsu.edu/thesis>

Best Wishes,

Lauren Cooper

Associate Director for Facilities Planning
Facilities Planning Design & Construction
San Diego State University
San Diego, Ca 92182-1624

619.594.6619 (tel)

Anthony Fulton, Director
 Dept. Facilities Design, Planning & Construction
 Division of Business and Financial Affairs
 5500 Campanile Drive
 San Diego CA 92182-1624

July 26, 2007

Dear Director;

SDSU is currently soliciting comments about its revised masterplan, and I would like to add a few of my own. I live just northeast of the Ralph's grocery on 67th and Montezuma, the neighborhood just east of the San Diego State University campus.

1) The proposal to ban parking on Alvarado to allow for an additional traffic lane as a mitigation for increased daily trips to the Alvarado complex of buildings is not acceptable. Parking on Alvarado from Reservoir to 70th St. is very competitive due to the many apartments there along Alvarado, and spaces are rarely available. Where will these people park if the parking is no longer allowed? Alvarado Road in the vicinity of Reservoir sits at the bottom of a ridge of land which projects above it. Houses along the rim of the ridge look down onto the housing complexes on Alvarado. This ridge precludes Alvarado parkers from simply parking on the adjacent side streets--in this area, there are no adjacent side streets. The neighborhood streets nearby are at least a half-mile away, given the topography and the routing of streets in the area.

A possible solution to the question "Where will parkers displaced along Alvarado find parking?" would be for SDSU to provide local residents nighttime parking in a new University parking structure adjacent to the east side of the Alvarado buildings. These parking spaces would be reserved for neighborhood parking at night and on weekends, and could require a neighborhood sticker, much like the B sticker required in other parts of the College area.

2) Although the University mentions time and again how interested SDSU is in creating alternative transportation modes for its students (and maybe also its staff), one excellent possibility that appears to have been ignored in sunny warm San Diego is the use of bicycles. The Associate Director/Campus Architect's only response to questions about bicycles and SDSU was to note that bicycles were a problem. The traffic engineering consultant admits bicycles were not counted in any of the traffic surveys. The campus ring road is not accessible from the westbound bicycle lane on Montezuma. The parking area for bicycles in the dorm area off Montezuma and College was recently abolished and replaced with a recycling area.

These questions about bicycles and campus are not new--I raised them with both Tony Fulton and Clayton Kraft (SDSU-MTDB Trolley project coordinator) two years before the SDSU trolley stop was completed, and several years before the masterplan was submitted for the EIR. Questions about bicycles were raised at the original masterplan EIR presentations, but apparently were not addressed either in the revised masterplan, or in the EIR documents.

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and Construction

I-66-1

I-66-2

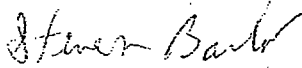
There are numerous reasons why SDSU should be a leader in promoting bicycling to campus. Many of the students living in the College area could bicycle, rather than take a car to campus. Bicycle operation is an important component of commuting on other CSU/UC campuses, does not consume gasoline, does not emit noxious greenhouse gases, does not require large, high maintenance roadways, and does not require large multistory garages (although I have seen double-decker bicycle parking lots overseas).

If there are few bicycle commuters to campus, some of blame for this should be placed on SDSU for failing to provide any incentives for its bicycling commuter population.

I look forward to seeing these issues addressed in the final masterplan EIR.

Sincerely yours

Steven Barlow

A handwritten signature in cursive script that reads "Steven Barlow".

I-66-2
Cont.

I-67

8/1/07

To: Ms. Lauren Cooper

Associate Director
Department of Facilities Planning, Design and Construction
Administration Building, Room 130
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

RECEIVED
AUG 6 2007
Facilities Planning, Design
and Construction

Dear Ms. Cooper:

HEARING ABOUT
After reading the Draft EIR, I have the following concerns regarding the Faculty/Staff Housing proposed in Adobe Falls.

Please give us your assurance that the buildings in Adobe Falls will house only faculty and staff and will never be converted to student housing in the future. We would like this assurance in the final EIR and in the covenants.

I-67-1

As far as accessing Smoke Tree's private driveways in the second phase, I am opposed to that notion for the following reasons:

All of the Smoke Tree roads are designated fire lanes; we do not have curbside parking or sidewalks. These fire lanes are approximately 22 feet wide and cannot accommodate 1,500 more ADTs. The roadway classification in the EIR is erroneous. Our physical safety and that of our pets would be impaired if 1,500 ADTs were added because we have no sidewalks nor any place to pull over. We must either drive or walk to one of 3 community mailboxes because the Post Office will not deliver mail to individual units. With 1,500 more ADTs planned, we will not be able to do this safely. Mail delivery, trash pickup, moving vans, repair trucks, appliance deliverers, streetlight maintenance, and emergency vehicles would basically stop any traffic flow as there would not be sufficient space to go around them if 1,500 ADTs were added.

I-67-2

Our fire lanes are privately funded and we simply cannot afford to repave more often than we already do for our own traffic needs.

I also disagree that the western side of Adobe Falls Road can handle 6,500 ADTs when it is not as wide as Del Cerro Blvd, which you are rating as the same 2-lane collector capacity roadway. You are rating Del Cerro Blvd to have a maximum desirable capacity at 5,000 ADTs, "LOS C". Yet you are rating the western side of Adobe Falls Road with a higher capacity at "LOS D" to get the numbers to work to build more units. We request the same consideration for the west side of Adobe Falls Road. Additionally, your existing traffic numbers will need to be updated by the Levanto condominium project currently under construction. There is also a proposal for 50 more apartments on the North side of western Adobe Falls Road too.

I-67-3

I object to the additional particulate matter and visual quality deterioration that would ensue from building a bridge over the flood control channel in Smoke Tree.

I-67-4

I also want your assurance, before the Lower Village is constructed, that we in Smoke Tree are assured that the development will not cause the rain runoff to be more than the flood channel can bear.

I-67-5

Sincerely,

Bob Brundage

Name and Address

Michael Brundage

5667B ADOBE FALLS RD
SD 92120

I-68

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RECEIVED
AUG 8 2007
Facilities Planning, Design
and Construction

6/27/07

Anthony Fulton
Director of Facilities Design
San Diego State University
500 Capanile Dr.
San Diego, CA 92182-1624

Dear Sir:

As a resident of a nearby street from Adobe Falls Rd, I am requesting that SDSU do a full disclosure of the impacts to Adobe Falls Rd. Additionally, I would like to know what mitigation measures they propose for the significant traffic impacts there in light of the uniquely sloped grade.

I-68-1

SDSU has misclassified our streets and the EIR states they have a capacity of 1500 ADT. The surrounding streets have a Low Volume Residential rating with a capacity of only 700 cars, less than one half their 1500 classification.

I-68-2

Lastly, the EIR has invented a rating of LOS (Levels of Service). This is fantasy and borders on fraud. Residential streets have no LOS rating. Please force SDSU to be truthful remove this fictional rating from their EIR report.

I-68-3

There are many more concerns the residents of the area have and I would plead with you to look into. I look forward to your response and thank you in advance for your help.

Sincerely,



Cc Leonard Bloom, Senator Christine Kehoe, Assemblywoman Shirley Horton, Assemblywoman Lori Saldana, Assemblyman George Plescia, County Supervisor Dianne Jacob, Councilman Jim Madaffer, San Diego Unified School District Superintendent Carl Cohn, Board member Katherine Nakamura