

## **RESPONSES TO COMMENTS REPORT**

## Responses to Comments Report

Comment S-1-1	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
<p>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.</p> <p>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.</p>	<p>The EIR prepared for the SDSU Campus Master Plan Revision determined that the Project would result in significant traffic impacts at roadway locations within Caltrans' jurisdiction. Specific to the comment, the EIR determined that the project would result in significant impacts on College Avenue in the vicinity of the I-8 overcrossing. (See, e.g., DEIR p. 3.14-100, College Avenue I-8 EB and WB ramps.)</p> <p>With respect to mitigation, over the past several months, SDSU, on behalf of the California State University ("CSU"), and Caltrans District 11 personnel have been meeting in an attempt to reach agreement regarding feasible mitigation, respective cost estimates, and fair-share responsibility. A summary of those meetings and their outcome is provided in General Response 3, City of Marina Compliance.</p>	
Comment S-1-2	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
<p>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.</p>	<p>For information responsive to this comment, please see General Response 3, City of Marina Compliance.</p>	
Comment S-1-3	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
<p>Caltrans has the following additional comments pertaining to the traffic analysis</p>	<p>The forecast percentage distribution of the project on I-8 between College</p>	

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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?

Avenue and Lake Murray Boulevard is about 7% in the eastbound and westbound direction. The percentage distribution on Alvarado Road between College Avenue and Lake Murray Boulevard is about 5% in the eastbound and westbound direction. A Select Zone Assignment was conducted to estimate these percentages.

Comment S-1-4	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
<p>Page 51, Table 9-9, Near-Term Freeway Mainline Operations Interstate 8:</p> <p>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.</p>	<p>The comment is correct. The Final EIR will include revisions to the traffic technical report, Draft EIR Appendix N, Table 9-9, as well as revisions to the corresponding EIR table, Table 3.14-25. The correction will result in an improvement in overall calculated freeway operations.</p>	
Comment S-1-5	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
<p>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. Please clarify.</p>	<p>The reason the near-term with and without project ADT are lower than the existing + project ADT is because the near-term with project volumes only include project traffic generation between 2007 &amp; 2012, while the existing + project volumes include all project traffic generated through 2025, i.e., project buildout volumes.</p>	
Comment S-1-6	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
<p>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.</p>	<p>The reason for the differences in volumes is because different "K" and "D" factors were utilized for the freeway existing analysis and for the near-term analysis. In order to be consistent, the existing and existing + project analysis will be revised in the Final EIR to utilize the same K &amp; D factors as the near-term analysis. The revisions will not affect the conclusions reached in the freeway impact analysis. The Final EIR will include revisions to the following tables: EIR Table 3.14-11, Freeway Mainline Operations Existing Conditions; Table 3.14-20, Freeway Mainline Operations Existing + Project; Appendix N Table 5-5, Freeway Mainline Operations Existing Conditions; and Appendix N Table 9-5, Freeway Mainline Operations Existing + Project.</p>	
Comment S-1-7	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
<p>Figure Page 62, Table 10-4, Horizon Year Mainline Operations Interstate 8:</p> <p>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</p>	<p>The comment is correct. The Final EIR will include revisions to the traffic technical report, Draft EIR Appendix N, Table 10-4, as well as revisions to the corresponding EIR table, Table 3.14-29. The correction will result in an improvement in overall calculated freeway operations.</p>	

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with 12,000 as stated previously on Page 42, Table 9-5. Freeway Mainline Operations Existing + Project.

Comment S-1-8	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
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.	The reason for the differences in volumes is because different "K" and "D" factors were utilized for the freeway existing analysis and for the horizon analysis. As noted in the response to comment S1-6 above, in order to be consistent, the existing and existing + project analysis will be revised in the Final EIR to utilize the same K & D factors as the horizon analysis. The revisions will not affect the conclusions reached in the freeway impact analysis.	
Comment S-1-9	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
Please specify applicable year in all Tables and Figures, i.e. Existing 2005. Near-Term = 2012. Horizon Year = 2025.	The various study year scenarios are documented in the text of the Draft EIR, and in the traffic technical report provided in Appendix N. However, in response to the comment, the EIR tables and figures, as well as the Appendix N tables and figures, will be revised to add the specific study year, i.e., 2012 (near-term) and 2030 (horizon year).	
Comment S-1-10	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
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.	Since Waring Road does not extend south of I-8, very little project traffic would utilize this interchange. Additionally, project traffic is not expected to utilize Fairmount Avenue to eastbound I-8 since doing so would require traffic to go west on Montezuma Road to Fairmount Avenue and then go back east on I-8.	
Comment S-1-11	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
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.	<p>The comment is correct as to the footnote reference. The Final EIR will include revisions to the traffic technical report, Draft EIR Appendix N, Table 5-4, as well as revisions to the corresponding EIR table, Table 3.14-10.</p> <p>With respect to the ramp volumes, the volumes shown in the table are on a "per lane basis," which means that a volume of 500 on Figure 4-2 is shown as 250 in the table if 2 lanes are provided.</p>	
Comment S-1-12	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
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.	The reason for the differences in volumes is because different "K" and "D" factors were utilized for the freeway existing analysis and for the near-term analysis. As noted in the response to comment S1-6 above, in order to be consistent, the existing and existing + project analysis will be revised in the	

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Final EIR to utilize the same K & D factors as the near-term analysis. The revisions will not affect the conclusions reached in the freeway impact analysis.

<b>Comment S-1-13</b>	<b>Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007</b>	<b>Response</b>
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.		The Fletcher Parkway interchange was not analyzed in the traffic study because very little project traffic is expected to utilize this interchange, which is located over 2 miles from the campus. The Select Zone Assignment showed that less than 1% of project traffic would use the interchange. This is principally due to the fact that the College Avenue and 70th Street interchanges are both located closer to the campus than the Fletcher Parkway interchange.
<b>Comment S-1-14</b>	<b>Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007</b>	<b>Response</b>
The existing traffic volumes at I-8 WB ramps/Parkway Drive appear low. Please consult with Caltrans to clarify these existing count volumes.		The I-8 westbound ramp/Parkway Drive intersection is currently all-way stop controlled, which is an indication that traffic volumes are relatively low, since a traffic signal has never been installed. High volumes would have required signalization. The existing volumes at this intersection reported in the EIR were checked and found to be correct.
<b>Comment S-1-15</b>	<b>Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007</b>	<b>Response</b>
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.		The project trip traffic percentages shown on Figure 8-8 are based on a Select Zone Assignment prepared by SANDAG. The 50% total is accurate.
<b>Comment S-1-16</b>	<b>Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007</b>	<b>Response</b>
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.		In response to comments submitted by SANDAG on the Draft EIR, the Final EIR will include a mitigation measure requiring that SDSU develop a TDM program for the campus. Please see the response to comment number R2-10 contained in the SANDAG comment letter.
<b>Comment S-1-17</b>	<b>Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007</b>	<b>Response</b>
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		SDSU will work closely with Caltrans and the City of San Diego regarding the future reconstruction of the I-8/College Avenue interchange. SDSU has met with City of San Diego staff (Labib Qasem) to review draft proposed plans for the interchange and City staff did not raise objections to the proposed plans.

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because the City would not approve non-standard lane widths.

Comment S-1-18	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
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.	The mitigation proposed in the EIR consists of SDSU supporting the efforts of Caltrans to obtain funding for the necessary roadway improvements from the state Legislature, and the contribution by SDSU of its fair-share of the costs to provide the necessary improvements to the City of San Diego and the City of La Mesa, if appropriated by the state Legislature; SDSU is not proposing to perform any work within the Caltrans right of way.	
Comment S-1-19	Comments from Department of Transportation (Caltrans/Jacob Armstrong), 7/26/2007	Response
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.	Please see the response to comment S1-18, above.	
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.		
Comment S-2-1	Comments from Department of Toxic Substances Control (DTSC/Ken Chiang), 7/24/2007	Response
<p>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:</p> <p>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."</p>	<p>Development of the proposed project would entail the demolition of certain old structures. (See, Draft EIR Section 3.6.5.1.8, Asbestos and Lead Paint.) For that reason, the Draft EIR contains mitigation measures HHM-4 and HHM-5, which address, respectively, potential impacts relating to the release of asbestos and lead paint as the result of demolition activities. In response to the comment, and to clarify the soil/material testing that must occur prior to the demolition of any existing structures, mitigation measure HHM-5 will be revised to require that on-site testing during demolition preparation include testing for organochlorine pesticides that may be present from past use of termiticides, in addition to testing for lead-based paint contamination. Specifically, mitigation measure HHM-5 will be revised to read as follows:</p> <p>HHM-5 Prior to demolition of any of the structures located within the Student Housing, Alvarado Campus, and Student Union areas of focus, SDSU, or its designee, shall secure the performance of a lead paint survey by a certified lead paint specialist, and a pesticide residue survey (from organochlorine</p>	

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pesticides from termiticides) by a qualified testing specialist. The lead paint survey information and pesticide residue survey shall be used to define removal quantities, estimate abatement costs, and otherwise refine the scope of work for lead abatement, in compliance with all applicable laws, during project demolition.

Comment S-2-2	Comments from Department of Toxic Substances Control (DTSC/Ken Chiang), 7/24/2007	Response
<p>2. According to the DEIR:</p> <p>a former leaking underground storage tank was located next to Zura Hall.</p> <p>An active gas station is located at 51 11 College Avenue, and former dry cleaning operations were located at 51 85 College Avenue and 5924 Hardy Avenue</p> <p>Because the project is school site related, DTSC recommends that an environmental review, such as Preliminary Endangerment Assessment (PEA), be 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.</p> <p>If you would like to discuss this matter further, please contact Ms. Ivy Guaño at (714) 484-5433 or me at (818) 551-2860.</p>	<p>The commentor is correct in stating that a former leaking underground storage tank was located next to Zura Hall, that 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. The Draft EIR notes the presence of these adjacent past and existing uses (DEIR, p. 3.6-24-27).</p> <p>Dudek Hydrogeologists spoke with Ken Chiang (author of the DTSC letter) and Ivy Guano (contact listed in the DTSC letter) on August 6, 2007 and August 7, 2007, respectively, regarding the suggestion of additional environmental review such as a Preliminary Endangerment Assessment ("PEA") to determine the potential extent of these past and existing hazardous uses. Mr. Chiang and Ms. Guano confirmed that PEAs are required for public schools supporting grades K-12, but are optional for universities.</p> <p>The Draft EIR (Section 3.6) and the Phase I Environmental Site Assessment prepared in conjunction with the Draft EIR (included as Appendix G to the Draft EIR), discuss the presence and potential residual hazard associated with each of these three off-site uses. As noted in the Draft EIR, the leaking underground storage tank next to Zura Hall was removed in 1996 and the case was closed in 1998. (DEIR, p. 3.6-26.) Therefore, the Draft EIR appropriately concludes that this past hazard would not pose a significant impact to project implementation.</p> <p>The Draft EIR acknowledges that a former leaking underground storage tank is located at 5111 College Avenue (adjacent to campus, west of Olmeca and Maya Halls). The Draft EIR states that it is unlikely that contaminated soil and groundwater at this site have impacted the environmental conditions within the Olmeca/Maya Student Housing Area of Focus to the east; hence, the County of San Diego Department of Environmental Health's issuance of a closure letter for the site in 2001. Nevertheless, the Draft EIR concluded that the operation of this gas station may result in a potentially significant impact to the proposed project areas during development and, therefore, mitigation is proposed to ensure that any contaminated soil that is discovered is properly</p>	

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handled and disposed. Mitigation Measure HHM-2 outlines the requirements of a Health and Safety Plan to ensure that any contaminated soil that is encountered on SDSU's property (within the proposed project component footprint) during project construction be handled and disposed of in a safe manner per governmental requirements. (DEIR p. 3.6-30.)

Finally, the Draft EIR also acknowledges that former dry cleaners were located at 5185 College Avenue and 5924 Hardy Avenue. (DEIR, p. 3.6-26). The EIR states that while there is no information to suggest that there is contamination at these sites, contamination at former dry cleaning sites is not unusual. Therefore, because of their proximity to the Student Housing and Student Union areas of focus, the EIR identified this as a potentially significant impact and provided mitigation. Mitigation Measure HHM-3 has been included in the Draft EIR to ensure that construction activity on SDSU's property, adjacent to the former dry cleaners, proceeds under the guidance of a Health and Safety Plan, which would outline measures to take should potentially contaminated soil be encountered during project construction.

In conclusion, while SDSU agrees that unknown contamination related to past and historic off-site uses may have impacted subterranean portions of the SDSU campus, the Draft EIR includes a mitigation program that would ensure that any soil contamination that is encountered during construction be handled in a safe manner per existing government regulations. The need for additional site review and soil testing, therefore, is not necessary.

Comment S-3-1	Comments from California Highway Patrol (C.M. McGagin),	Response
<p>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.</p> <p>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</p>		<p>Based on SANDAG projections of future trolley boardings at the San Diego State University station, the Draft EIR traffic impacts analysis projects that the project would result in a net increase of approximately 2,531 ADT by the academic year 2011/2012, and 12,484 ADT by project buildout year 2024/25. (Draft EIR pp. 3.14-36 and 3.14-38.) As the comment notes, a portion of these trips will be distributed to the area freeways, primarily Interstate 8.</p>



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SDSU trolley riders will increase to 6,669, an increase of 1,943 additional trolley riders."

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**Comment S-3-2****Comments from California Highway Patrol (C.M. McGagin),****Response**

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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.

San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment regarding the increase in young drivers, and the need for education and training. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.

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.

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**Comment S-4-1****Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),****Response**

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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 comment is an introduction to comments that follow; no specific response is required. San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.

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 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

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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.

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.

Comment S-4-2	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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 part of 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 SDSTJ. 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.	As the commentor notes, the Draft EIR included analysis of a No Adobe Falls Alternative, and a 50% Adobe Falls Alternative. (DEIR 5.0-16 to 5.0-22.) Under the No Adobe Falls Alternative, the proposed Adobe Falls Faculty/Staff Housing development would not be included as part of the project. (DEIR 5.0-16). If this alternative is chosen, all biological resource impacts related to this project component would be eliminated. (DEIR 5.0-16.)  The 50% Adobe Falls Alternative would result in a 50% reduction of proposed housing units from 348 to 174. (DEIR, p. 5.0-16.) This Alternative would result in the construction of 50% of the housing units proposed under the project in the Upper Village (24), and 50% of the housing units proposed in the Lower Village (150), and a corresponding reduction in the development footprint impact area. (See, Final EIR Figure 5.0-3). Construction of the 50% Alternative would result in the following impacts to sensitive habitats:  50% Adobe Falls Faculty/Staff Housing Alternative Sensitive Habitat Impacts  Habitat Type: Intermittent/ephemeral unvegetated Waters of the US – Total Impacts	

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(acres): 0.03

Mule fat scrub – Total Impacts (acres): 0.06

Southern willow scrub – Total Impacts (acres): 0.08

Disturbed wetland – Total Impacts (acres): 0.21

Total wetland – Total Impacts (acres): 0.38

Baccharis scrub – Total Impacts (acres): 2.88

Coastal sage scrub – Total Impacts (acres): 3.63

Disturbed coastal sage scrub – Total Impacts (acres): 0.09

Southern mixed chaparral – Total Impacts (acres): 1.97

Ornamental plantings – Total Impacts (acres): 0.22

Non-native annual grass land – Total Impacts (acres): 0.53

Disturbed habitat – Total Impacts (acres): 0.40

Total Uplands – Total Impacts (acres): 9.72

Total Impacts – Total Impacts (acres): 10.10

The 50% Alternative would avoid some of the impacts to the San Diego County viguiera and California adolphia plants located within the proposed Upper Village development footprint. Further, this alternative would avoid a portion of the impacts to the California gnatcatcher. However, impacts to this species would still occur because the entire site's suitable gnatcatcher habitat is considered occupied.

### Comment S-4-3

### Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),

### Response

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 MUPA.

None of the proposed SDSU project areas are located within the Multiple Habitat Preservation Area (MHPA), as delineated in the City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan. Moreover, the proposed project development on the Adobe Falls parcel is not anticipated to have any direct or indirect impacts to the movement of wildlife species within the MHPA. The closest segments of the MHPA to the proposed project area include Lake Murray (approximately 2 miles east of Adobe Falls), Chaparral Canyon (approximately 1 mile east of Adobe falls), the San Diego River drainage as it flows west and south from Mission Trails Regional Park (approximately 2 miles north and 1 mile east of the Adobe Falls parcel), and a series of canyons and north-facing slopes on the south side of Interstate 8 (approximately 500 feet south of the Adobe Falls parcel). A direct surface connection from the Adobe Falls area to any of these MHPA segments is not possible, due to the presence of major roadways and commercial and residential developments adjacent to and near the Adobe Falls site. The only potential wildlife corridor within the general vicinity of the Adobe Falls project site is the San Diego River, which connects to Alvarado Creek via an approximately 0.5 mile concrete-lined flood control channel. This concrete

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channel is maintained and provides no cover for terrestrial wildlife to move from the project site to the downstream areas of the San Diego River (areas included within the City of San Diego MHPA). The Adobe Falls parcels do not provide adequate terrestrial or aquatic habitat linkages to any upstream or downstream MHPA segments without significant interruption by interstate freeways, major surface streets, parking lots and/or commercial and residential development.

Comment S-4-4	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
<p>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.</p>	<p>The Draft EIR analyzed the proposed projects impacts to hydrology and water quality Section 3.7. The analysis determined that development of the site would reduce on-site infiltration as a result of an increase in impervious surfaces in presently undeveloped areas that either drain to Alvarado Creek or naturally percolate into the soil. (DEIR p. 3.7-16.) DEIR Table 3.7-3, Peak Flow Summary, illustrates that, following project development, the peak flow rates of Alvarado Creek at the point where the creek leaves the Adobe Falls site would be increased by 2.5 cubic feet per second ("cfs") for an 85th percentile storm event (an 85th percentile storm event represents a "first flush" rain event), 4.38 cfs for a 2-year storm event, 7.13 cfs for a 10-year storm event, and 10.14 cfs for a 100-year storm event. (DEIR pp. 3.7-16 and 3.7-18.) The DEIR determined that the increase in runoff volumes for each storm event represented a potentially significant impact. (DEIR p. 3.7-16.)</p> <p>Increased storm water flows and untreated runoff from the Adobe Falls site could potentially directly or indirectly impact existing biological resources on and adjacent to the project site. Additional storm water runoff quantity or velocity could result in increased erosion on the Adobe Falls site or immediately downstream of the site within the remaining naturalized portions of Alvarado Creek. Increased storm water runoff quantity or velocity may potentially result, during high flows, in loss of vegetative cover established along the naturalized portions of Alvarado Creek including the City of San Diego's Adobe Falls Supplemental Environmental Project area (located immediately north of the SDSU Adobe Falls Faculty/Staff Housing site). Additional storm water flows could potentially decrease water quality on or downstream of the project site. Water that contains oils, grease and other pollutants (which is often found in untreated run-off leaving developed areas) could negatively impact native plant establishment, aquatic wildlife health and/or reproductive cycles. These negative effects could in turn have indirect or direct effects on wildlife species higher on the local food chain.</p> <p>In response to this potentially significant impact, the DEIR includes mitigation</p>	

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measure HWQ-2, which requires that prior to the preparation of final design plans for the Adobe Falls Faculty/Staff Housing Upper and Lower Villages, SDSU shall conduct a detailed site-specific hydrologic analysis to further assess the effects of the proposed project on the floodplain and downstream streambed capacities. Based on the analysis results, on-site detention facilities may be required. (DEIR p. 3.7-29.) Should the projected flows result in an increase over the existing condition, onsite detention would be required. This would ensure that the same hydrology would be present post-construction as currently exists within the Alvarado Creek drainage system. (Please note that Mitigation Measure HWQ-2 has been revised to clarify the extent of the hydrological study to be conducted. The revised mitigation measure will be included in the Final EIR.)

Similarly, Mitigation Measure HWQ-1 and HWQ-11, (DEIR, p. 3.7-28-29, 3.7-32), outline best management practices to be incorporated into the final design plans. These measures would ensure that any run-off leaving development areas would be of similar or higher quality compared to water currently draining from the undeveloped SDSU property, into the Alvarado Creek aquatic system. In addition, Best Management Practices (BMPs) will be incorporated on the project site per the RWQCB 401 permit and the site specific storm water management plan that will ensure that wildlife and habitat downstream and/or adjacent to the project site are not directly or indirectly impacted by low water quality, erosion, sedimentation or other unanticipated effects associated with development of the project site.

Comment S-4-5	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
<p>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.</p>	<p>USFWS protocol surveys were conducted for the Federally listed-threatened coastal California gnatcatcher on the Adobe Falls property during March and April of 2007 by Dudek gnatcatcher permitted biologist Paul Lemons. During the protocol surveys, one nesting pair of gnatcatchers was observed within coastal sage scrub habitat on the site of the proposed Upper Village. On April 2, 2007, the gnatcatcher pair was observed building a nest within California sagebrush on site, and on April 24, 2007, Paul Lemons observed the pair performing nest switches indicating incubation of eggs. These observations were documented in the protocol survey report dated June 7, 2007, which was submitted to the USFWS per survey permit requirements. Based on the results of these protocol surveys, the coastal sage scrub on the Adobe Falls site is considered occupied.</p> <p>Potentially suitable habitat for the federally-listed endangered least Bell's vireo is not present on the SDSU Adobe Falls property and was noted as such in</p>	

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the Draft EIR. The City of San Diego's Adobe Falls Supplemental Environmental Project, a wetland enhancement project administered by the Metropolitan Wastewater Department (MWWd), located north of the SDSU ownership, may contain potentially suitable habitat for the least Bell's vireo. This wetland enhancement project is intended to create a mixture of native riparian habitats that may ultimately be suitable for the least Bell's vireo.

Several mitigation measures included in the Draft EIR will help prevent significant indirect impacts from affecting the least Bell's vireo. For example, Mitigation Measure BR-5 (DEIR, p. 3.3-77) requires that SDSU not utilize non-native plants in landscaped areas adjacent to native habitat, including Alvarado Creek. Non-native species invasion in streams or rivers can often negatively impact the suitability of habitat for the least Bell's vireo. By restricting the type of landscape material to that of native species, this potential threat is severely reduced. Mitigation Measure BR-7 (DEIR, p. 3.3-77) mandates that a Storm Water Pollution Prevention Plan be incorporated into the project's Water Quality Management Plan. Poor water quality can affect the quality of habitat and therefore negatively affect the potential food sources necessary for a healthy least Bell's vireo population. By controlling pollutants in project runoff, during both construction and once the project is operational, potential direct or indirect water quality effects on this species can be avoided. Mitigation Measure BR-8 (DEIR, p. 3.3-77) requires that adequate buffers be maintained. Buffers, along with human and domestic pet invasion control techniques outlined in Mitigation Measure BR-12 (DEIR, p. 3.3-79) would help reduce the potential for disturbance of potential vireo in habitat adjacent to the SDSU property. Finally, Mitigation Measure BR-9 (DEIR, p. 3.3-78) mandates that SDSU utilize low-pressure sodium lights, as much as possible, to decrease negative effects associated with artificial light spill-over into adjacent wetland habitat.

Comment S-4-6	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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.	The comment is noted. SDSU agrees that consultation with the USFWS will be necessary as a result of the proposed "take" of the federally-listed threatened coastal California gnatcatcher. Draft EIR Section 1.7.2, Requested Project Approvals, states that permits from state and federal regulatory agencies would be required prior to project construction (DEIR, p. 1.0-62). The EIR identifies unavoidable impacts to occupied coastal sage scrub habitat within the Adobe Falls project area. Construction of the Adobe Falls Faculty/Staff Housing project component would result in impacts to wetlands and waters of the U.S. Because these resources are regulated by both state and federal agencies, SDSU will obtain a permit from the US Army	

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Corps of Engineers to ensure compliance with Section 404 of the Federal Clean Water Act. Assuming the project will result in impacts to federally-protected wetlands and therefore a permit from the US Army Corps of Engineers will be necessary, SDSU will have a "federal nexus" and can process a take permit utilizing the guidelines in Section 7 of the Federal Endangered Species Act. Although not likely given the existing project design information known to-date, should the project avoid all impacts to federally-protected wetlands, thereby eliminating a federal agency nexus, SDSU may prepare a Habitat Conservation Plan (pursuant to Section 10 of the Federal Endangered Species Act) which outlines the provisions for take, and associated mitigation, for the gnatcatcher.

Comment S-4-7	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
<p>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 MVA 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 ETR 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.</p>	<p>The SDSU ownership (SDSU Field Station Program – Fortuna Mountain Research Reserve) on Fortuna Mountain consists of five parcels which total 153.3 acres. The Mt. Fortuna site was originally owned by the U.S. Government as part of Camp Elliott. During World War II, the mountain was used as a practice artillery firing range. When the federal government disposed of Camp Elliott property, SDSU was granted use of the property for habitat research.</p> <p>After 25 years of such use, the property reverted to SDSU ownership. The land has been used as an active research field station. Field station activities include active and passive biological resource studies and experiments with ecosystem management techniques.</p> <p>Should Fortuna Mountain be the ultimate upland habitat mitigation site chosen to offset project impacts, approximately 22.31 acres of the 153.3 acre research station would be conserved. Once this conservation occurs, all research activities and other uses on this subject portion of the SDSU ownership will cease. Should Fortuna Mountain be utilized as mitigation for impacts to occupied California gnatcatcher, all activities that would impact sensitive species or habitats would cease. Future activities on the subject land would only occur if they were consistent with MSCP guidelines for acceptable activities within conserved areas. Should any future activities need to occur on the proposed mitigation land, an informal consultation with the regulatory agencies would occur to ensure that all parties agreed on the appropriateness of the activity.</p>	
Comment S-4-8	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response

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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. To it is determined that there is no gnat catcher-occupied CSS on the Fortuna Mountain sire, SDSU should coordinate with the Wildlife Agencies to determine alternate locations that would be appropriate for in-kind mitigation.

As indicated in Mitigation Measure BR-2, (DEIR, p. 3.3-75 – 76), SDSU proposes to mitigate for direct impacts to California gnatcatcher through the purchase and preservation of uplands habitat, including gnatcatcher habitat. The purchase and preservation may occur on Fortuna Mountain. SDSU understands that during resource agency permitting, protocol surveys of the proposed Fortuna Mountain parcel(s) must be conducted prior to finalization of the gnatcatcher mitigation program, which will be required prior to project construction. Further, should Fortuna Mountain not be deemed suitable habitat, the 22.31 acres of mitigation (in the form of occupied coastal California gnatcatcher habitat) can be accommodated elsewhere within the MHPA.

Comment S-4-9	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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. 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 propose& 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.		Based on activity at other SDSU Field Stations, as well as the proximity of the Adobe Falls site to the SDSU campus, it is assumed that classes with 25-30 students per class would visit the site approximately 12 times per year. As the comment notes, educational activities would consist primarily of visual sensing, as well as wildlife, air, water quality, and remote fire sensor monitoring. The exact location of student work areas has not yet been determined. However, as indicated in Mitigation Measure BR-6, the project must site and design all future trails or other academic/auxiliary uses to avoid all sensitive habitats and species as much as possible.

Comment S-4-10	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
9. The DEIR does nor 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		As indicated in the Draft EIR (DEIR, p. 3.3-32), approximately 45 California adolphia (Adolphia californica) plants are located on the project site, within coastal sage scrub habitat near the west end of the proposed Upper Village site. These plants co-occur with some San Diego County viguiera (Viguiera californica) plants. Based on the initial project designs for the Upper Village area, all of these plants (between 30 and 45) may be directly impacted by the



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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 CM'S' designation. In addition, the Department recognizes that CLAPS List IA, 113, 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.

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.

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.

proposed Upper Village development. In response to the comment, Draft EIR Figures 3.3-2 and 3.3-3 have been revised to depict the California adolphia individuals. (The revised Figures will be included in the Final EIR.) The Draft EIR identified this potential impact as not significant due to the localized nature of the impact, the limited number of individual plants being impacted, and the fact that many more plants are present within preserved MHPA areas within the City of San Diego. However, as the commentor notes, California adolphia is not a covered species under the MSCP. Notwithstanding, in an effort to preserve the genetic diversity of this species, mitigation will be added to the EIR (BR-14) requiring that prior to grading, SDSU shall make every attempt possible to salvage the onsite California adolphia individuals that will be impacted. Assuming salvage is possible prior to grading, translocation can occur onsite within the coastal sage scrub habitat planned for conservation immediately west of the proposed Upper Village development.

Comment S-4-11	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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		Please see the response to comment S4-10, above.

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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 E.

Comment S-4-12	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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 tipper 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.	<p>The development of any trails on the Adobe Falls site would not occur until development of the Lower Village. The Lower Village will be developed over the long-term, sometime beyond the year 20212, with no commencement date presently planned. (Draft EIR p. 1.0-36.) Accordingly, the Lower Village site was analyzed in the EIR at the program level of review, and development of the site will undergo additional CEQA analysis prior to project construction. During subsequent development phases, the Lower Village trail system will be designed, and analysis of the impacts associated with the trails will be assessed.</p> <p>At this time, it is contemplated that the Lower Village may include a trail along some portion of streets or along the rear side of residential lots. However, this system would be contained entirely within the proposed development footprint, thereby eliminating the potential for any additional direct impacts to sensitive vegetation communities or biological resources beyond those described in the DEIR. Mitigation Measure BR-12 was included in the DEIR (DEIR, p. 3.3-79) to eliminate indirect effects of residents and potential trail users. This mitigation measure requires SDSU to provide signage, community education programs and other measures to reduce potential indirect impacts to sensitive resources as a result of trail use.</p>	
Comment S-4-13	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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.	<p>The comment is noted. As indicated in Mitigation Measure BR-1 (DEIR, p. 3.3-75), SDSU is required to create up to 0.20 acre of wetlands along the western boundary of the Adobe Falls Faculty/Staff Housing site within existing eucalyptus woodland and disturbed habitat on the Lower Village site, and also required to enhance up to 0.56 acre of wetlands within existing disturbed sycamore/cottonwood riparian woodland and disturbed wetlands habitat on the Lower Village site. Should either of these mitigation locations become infeasible during wetland mitigation design and planning, another viable wetland restoration opportunity exists within the portion of Alvarado Creek that traverses campus (upstream from the Adobe Falls Faculty/Staff Housing component). The Final EIR will include Figure 3.3.-9, which will depict all potential wetland mitigation sites.</p>	
Comment S-4-14	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response

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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.

The commentor correctly notes an error in Table 3.3-5 of the Draft EIR (DEIR, p. 3.3-73-74). The proposed mitigation ratio for mule fat scrub is 3:1, which would result in a total of 0.18 acre of mitigation to make up for the 0.06 acre of impact to this habitat type. This edit results in an increase of the total wetlands mitigation obligation for the Upper Village site (from 0.32 acre to 0.44 acre) and the total mitigation obligation (from 8.62 acre to 8.74 acre). This correction also increases the total wetlands mitigation proposed for both the Upper and Lower Village sites (from 0.57 acre to 0.65 acre) and off-site wetland creation (from 0.26 acre to 0.30 acre). Total mitigation for both the Upper and Lower Village sites would increase from 33.94 acres to 34.06 acres. All of these changes will be reflected in Final EIR revised Table 3.3-5.

### Comment S-4-15

### Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),

### Response

13. The final Elk 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 Elk 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 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.

No part of the Adobe Falls Faculty/Staff Housing component would directly impact the existing City of San Diego Metropolitan Wastewater Department's Supplemental Environmental Project (an ongoing mitigation site for biological resource impacts which resulted from past sewer spills). Several mitigation measures included in the DEIR address potential indirect impacts to sensitive habitat areas, including existing City of San Diego mitigation sites. Mitigation measures BR-5 (DEIR, p. 3.3-77) and BR-10 (DEIR, p. 3.3-78) would prevent proposed development landscaping from utilizing invasive or non-native species adjacent to native habitats. This will protect the mitigation site from invasive plant intrusion, which can be a potentially negative influence and hinder growth of native plants that have been planted in this mitigation area. Mitigation measure BR-7 (DEIR, p. 3.3-77) requires that SDSU prepare a Storm Water Pollution Prevention Plan to ensure that proper water quality measures are incorporated into project design. BR-8 (DEIR, p. 3.3-77 and 3.3-78) requires that an adequate buffer around sensitive habitats be retained within further site planning. This will help reduce domestic pet and human intrusion into the mitigation sites, which can often have detrimental impacts to a recovering site such as the mitigation area. Mitigation Measure BR-9 (DEIR, p. 3.3-78) requires that lighting be focused away from sensitive habitat areas to prevent disturbance to sensitive wildlife potentially utilizing the mitigation site. Mitigation Measures BR-11 and BR-12 (DEIR, p. 3.3-78 and 3.3-79, respectively) require that SDSU take measures to discourage human and domestic pet intrusion into sensitive habitat areas. The incorporation of these measures would reduce potential impacts to sensitive biological resources associated with adjacent mitigation sites to a level below significance (DEIR, p. 3.3-79).

### Comment S-4-16

### Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),

### Response

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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.

While the specifics of wetland and upland restoration, creation and preservation have not been determined at this stage of project development, Figures 3.3-9 and 3.3-10 have been prepared to generally describe the areas within which mitigation activity would take place both on and off site. Figures 3.3-9 and 3.3-10 note each restoration, creation and preservation area (both uplands and wetlands) proposed and outlined in Mitigation Measures BR-1 and BR-2 (DEIR, p. 3.3-75). Figures 3.3-9 and 3.3-10 will be included in the Final EIR.

Comment S-4-17	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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.		All construction staging and access routes shall be contained entirely within the proposed development footprints outlined on DEIR Figure 3.3-3. Therefore, no additional impacts associated with construction activity are anticipated. Further, a Mitigation Measure, BR-15, will be added to the Final EIR to avoid potential direct or indirect impacts to sensitive resources during construction. See response to comment S4-19, below.
Comment S-4-18	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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.		<p>The project is located within the lower San Diego River Watershed, which constitutes the project's general regional setting. Lake Murray is located approximately 2 miles to the east of the proposed project area and Mission Trails Regional Park is located approximately 2 miles to the north. These areas constitute the main open space areas within the general vicinity of the proposed project. A number of state and regionally-identified rare plant and wildlife species are located within the open space preserved by the Mission Trails Regional Park, Lake Murray, Rancho Mission Canyon, and Chaparral Canyon. Rancho Mission Canyon is a regional canyon located in the Navajo neighborhood, to the north of the project site, and Chaparral Canyon is the southernmost segment of Mission Trails Regional Park, located northeast of the project site.</p> <p>The San Diego River and Alvarado Creek, a perennial tributary of the San Diego River, constitute the drainage features within the general vicinity of the proposed project. The San Diego River flows southwesterly through Mission Trails Regional Park, north of the proposed project site, and then flows west towards the Pacific Ocean along the north side of Interstate 8, through Mission Valley. The River is in a relatively natural state for the majority of its course until it reaches Mission Valley where it is abutted by urban land uses. Alvarado Creek originates at the south end of Lake Murray and the Chaparral Canyon Open Space Area and then flows south beneath Interstate 8 and west through a portion of the main SDSU campus. The creek again traverses</p>

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Interstate 8 near SDSU Parking Lot A, daylighting along the northern slope of Interstate 8 at the site of "Adobe Falls," a historic complex of pools and braided stream channels. The creek continues north, traversing SDSU's undeveloped Adobe Falls parcel before it enters a concrete channel along the western edge of the SDSU ownership. The concrete channel carries the water for one mile, to its convergence with the San Diego River.

The main SDSU campus is located on a mesa along the southern rim of Mission Valley. This mesa and valley is one of a series of mesa and valley complexes that comprise the lower San Diego River watershed and contain the main stem of the river, as well as several tributaries. The main campus is located adjacent to a series of north-south trending canyons vegetated with coastal sage scrub and chaparral habitats, which are truncated by Interstate 8. The portions of the campus atop the mesa are surrounded by dense commercial and residential development. The SDSU-owned Adobe Falls parcels are located within the eastern end of the broad valley immediately north of the main campus and Interstate 8. The majority of the Adobe Falls parcels are located within a canyon, which is surrounded by residential developments to the north, east and west and steep vegetated slopes associated with Interstate 8. Steep hillsides dominated by chaparral, non-native grassland, and ornamental plantings are located north of the residential development that immediately surround the Adobe Falls parcels. Residential development is located atop these mesas north of the Adobe Falls site.

The Adobe Falls site includes two broad, gentle slopes divided by the main flow channel of Alvarado Creek. At the southern end of the SDSU-owned Adobe Falls parcel, Alvarado Creek flows through the "Adobe Falls" before heading north (onto City of San Diego-owned land) and then finally west toward the San Diego River, located approximately 1 mile downstream. The western portion of the Adobe Falls site drains northward toward the Alvarado Creek floodplain. The eastern portion of the Adobe Falls site slopes southward and westward and, therefore, drains toward Interstate 8 and Alvarado Creek, respectively. The western portion of the site is approximately 100 feet lower in elevation compared to the eastern portion of the site. The site is vegetated with coastal sage scrub, chaparral, native and non-native grassland, and wetlands and riparian woodlands associated with the Alvarado Creek drainage, and its unnamed tributaries that traverse the SDSU parcel. The Adobe Falls site is unique in that it is surrounded by residential development and a major transportation corridor, yet is a relatively large, undeveloped parcel containing a variety of native upland and wetland habitats.

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17. We recommend that the final EIR include the following additional conditions to help avoid and minimize impacts to biological resources:

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;

1. Disposal or temporary placement of excess till, 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.

The comment is noted. Mitigation Measure BR-15 has been added and will be included in the Final EIR to avoid and minimize impacts to biological resources during construction. Mitigation Measure BR-15 shall read as follows:

BR-15 To avoid potential impacts to sensitive biological resources associated with construction of the Adobe Falls Faculty/Staff Housing Upper and Lower Villages, the following measures shall be implemented prior to and during project construction as applicable:

- Prior to construction, a temporary fence (with silt barriers) shall be installed around the limits of project impacts (which include all construction staging areas and access routes) to prevent any additional habitat impacts, as well as the spread of silt from the construction zone into the adjacent wetland and upland habitats. Fencing shall be installed in a manner that does not impact habitats that must 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 outside of the fenced project limits shall be mitigated at a minimum 5:1 ratio. Temporary construction fencing shall be removed upon project completion;

- The clearing and grubbing of, and construction within 300 feet of, gnatcatcher occupied habitat shall occur outside of the gnatcatcher breeding season (March 15 through August 31, or sooner if a qualified biologist demonstrates to the satisfaction of the USFWS and CDFG that all nesting is complete);

- Construction employee activities, vehicles, equipment, and construction materials, shall be strictly limited to the fenced project footprint;

- To avoid attracting potential predators of wildlife on-site, the project site shall be kept as clean of feed and other organic debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site;

- Pets of project personnel shall not be allowed on the project site;

- Disposal or temporary placement of excess fill, brush or other debris shall not be allowed in waters of the U.S. or along banks;

- If nighttime construction work is necessary, night lighting shall be of the lowest illumination necessary for human safety, selectively placed, shielded and directed away from natural habitats.

- All equipment maintenance, staging, and dispensing of fuel, oil, coolant or any other activities, shall occur in designated areas outside of waters of the U.S. and within the fenced project impact areas. 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

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waters of the U.S., and shall be shown on construction plans (i.e., "no fueling zones" shall be delineated on construction plans). Fueling of equipment shall take place within existing paved areas at least 100 feet from waters of the U.S. Contractor's equipment shall be checked for leaks prior to operation and repaired as necessary.

Comment S-4-20	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
<p>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:</p> <p>a. <input type="checkbox"/> 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.</p> <p>b. <input type="checkbox"/> 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;</p> <p>e. 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;</p> <p>d. <input type="checkbox"/> 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;</p> <p>e. <input type="checkbox"/> Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust,</p> <p>f. Train all contractors and construction personnel on the biological resources</p>		<p>The comment is noted. Mitigation Measure BR-16 has been added and included in the Final EIR to avoid and minimize impacts to biological resources during construction. Mitigation Measure BR-16 shall read as follows:</p> <p>BR-16 <input type="checkbox"/> Prior to the commencement of construction activities at the Adobe Falls Upper and or Lower Villages, SDSU, or its designee, shall retain a qualified biological resource monitor to conduct the following activities:</p> <ul style="list-style-type: none"> <li>• Monitor initial clearing and grubbing of habitat to ensure that clearing and grubbing of habitat is done aboveground in a way that precludes nesting of birds but does not cause soil and/or root disturbance to vegetation that is to remain onsite;</li> <li>• Participate or oversee salvage and transplant of live plants to the mitigation sites as practicable;</li> <li>• Perform a minimum of three focused surveys, on separate days, to determine the presence of the gnatcatchers in the project impact footprint. 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. All construction must be at least 300 feet from any nesting gnatcatchers. In addition, the biologist will walk ahead of clearing/grubbing equipment to flush birds towards areas of coastal sage scrub 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 USFWS at least seven days prior to vegetation clearing/grubbing to allow the USFWS to coordinate with the biologist on the bird flushing activities;</li> <li>• Oversee installation of and inspect the fencing and erosion control measures within or upslope of restoration and/or preservation areas at a minimum of once per week and daily during all rain events to ensure that any breaks in the fences or erosion control measures are repaired immediately;</li> </ul>

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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.

- Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust;
- 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 (i.e. avoided areas shall be delineated on maps or on the project site by fencing per Mitigation Measure BR-15); 4) environmentally responsible construction practices; 5) the protocol to resolve environmental resource-based conflicts that may arise at any time during the construction process; 6) the general provisions of the federal Endangered Species Act, the need to adhere to the provisions of the Endangered Species Act, the penalties associated with violating the Endangered Species Act; and
- Halt work, if necessary, to ensure the proper implementation of species and habitat protection.

Comment S-4-21	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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.		As indicated in Mitigation Measure BR-12, SDSU shall introduce measures to discourage domestic pet intrusion into preserved natural areas in the Alvarado Creek area. This may consist of protective fencing devoid of gates.
Comment S-4-22	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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.		SDSU understands that the mitigation obligations outlined in Mitigation Measures BR-1 and BR-2 (onsite conservation, restoration and offsite conservation) will result in the need for undeveloped areas of the site to remain undeveloped and managed to ensure future biological resource health. However, because there are many ways to ensure that land will remain in an undeveloped state, SDSU is hesitant to commit to a specific conservation mechanism, such as a conservation easement, at this time. Commitment to such a mechanism at this stage may be premature as other mechanisms (i.e., fee-transfer title, management agreement with an outside entity such as the SDSU Field Stations Program, etc.) may be more appropriate given the state-owned nature of the land. During final design plans and regulatory permitting, the specifics of the conservation mechanism, management obligations and funding will be formalized and memorialized with the resource agencies.



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Comment S-4-23	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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 01998) 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, nonprofit organization, or other entity approved, by the Agencies.	See comment to Response S4-22, above.	
Comment S-4-24	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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 plan; myoponrum, 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 <a href="http://www.cal-ipc.org">http://www.cal-ipc.org</a> .	Mitigation Measures BR-5 and BR-10 (DEIR, p. 3.3-77 and 3.3-78, respectively) address project landscape plans. Specifically, these mitigation measures would require that invasive, non-native plant species, such as those suggested by the commentor, be avoided in any areas adjacent to native habitats.	
Comment S-4-25	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
23. If night work is necessary, night lighting shall be of the lowest illumination necessary for human safety, se/actively placed, shielded and directed away from natural habitats.	Restrictions on the use of lighting during construction are outlined in Mitigation Measure BR-14 (see response to comment S4-19 above). Once the proposed project is constructed, SDSU is required to minimize night lighting effects on adjacent sensitive habitats. As outlined in Mitigation Measures BR-9 (DEIR, p. 3.3-78), any outdoor lighting shall face away from preserved areas on the periphery of the Adobe Falls Faculty/Staff Housing site, and low-pressure sodium lights shall be used if possible to decrease negative effects associated with artificial night lighting.	
Comment S-4-26	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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 (Iridomyrmex humil), fire ants (Solenopsis invicia) and other insect pests. Any planting stock found to be	The comment is noted. In response to the comment, Mitigation Measure BR-1 will be revised to include a third paragraph, as shown below:  BR-1 Prior to commencement of grading activities on the Adobe Falls Faculty/Staff Housing Upper Village site, SDSU or its designee, shall	

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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.

preserve, or cause to be preserved, a total of 9.51 acres of onsite native habitats. The preservation areas shall occur outside of the Multi-Habitat Planning area (MHPA) within the proposed open space on the Adobe Falls Faculty/Staff Housing Site and shall include 5.20 acres of coastal sage scrub, 1.39 acres of baccharis scrub, 2.43 acres of southern mixed chaparral, 0.22 acre of valley needlegrass grassland and 0.43 acre of non-native annual grassland.

SDSU also shall create up to 0.20 acre of wetlands along the western boundary of the Adobe Falls Faculty/Staff Housing site within existing eucalyptus woodland and disturbed habitat on the Lower Village site and shall enhance up to 0.56 acres of wetlands within existing disturbed sycamore/cottonwood riparian woodland and disturbed wetlands habitats on the Lower Village site.

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 (*Iridomyrmex humil*), fire ants (*Solenopsis inviel*a), 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 Resource 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. SDSU, or its designee, 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.

Comment S-4-27	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
25. Any brush management required for the proposed project should occur within the project footprint, and not extend into the adjacent open space.		The comment is noted. This response clarifies that any required brush management shall occur entirely within the delineated project impact areas outlined on Final EIR Figure 3.3-3. No brush management shall occur within the wetland buffer area or undeveloped upland areas. See Final EIR Mitigation Measure BR-17.
Comment S-4-28	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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		As indicated in Mitigation Measure BR-12, SDSU, or its designee, shall implement programs and policies to ensure that future residents of the Adobe Falls Faculty/Staff Housing community understand the sensitive nature of

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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.

adjacent wetland and upland habitats, understand the regulatory ramifications of illegal impacts to such resources and understand the type of activities that are acceptable adjacent to such sensitive resources.

Comment S-4-29	Comments from CDFG (Michael Mulligan)/USFWS (Theresa O'Rourke),	Response
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.	The proposed development footprint described and analyzed in the Draft EIR incorporates a wetland buffer ranging from 25 to 75 feet. In general, buffer widths were determined based on the type of wetland area that was in need of protection, as well as the topography present nearby these sensitive areas. In many cases, topographic differentiation established a logical beginning/ending point for a buffer. A minimum 25-foot buffer was established along the perennial tributary to Alvarado Creek that conveys storm water flows from a culvert outlet on the southwest corner of the Adobe Falls site to Alvarado Creek to the south. This stream channel is three feet wide on average, incised up to 10 feet and surrounded by relatively steep slopes along the east and west. Wetlands and upland habitat up to 200 feet wide will be preserved in place and enhanced on the west side of this stream channel. A 25 foot buffer was initially established along the east side of this channel to conform to the steep slope that parallels this drainage, and to provide an overall buffer ranging in width from 100 to 250 feet wide along the stream channel. A general 75 foot wide buffer was initially established along the south edge of the floodplain of Alvarado Creek to conform with the present topography and native vegetation adjacent to the floodplain and wetlands associated with the stream. This includes an area of buffer surrounding the cismontane alkali marsh on the SDSU Adobe Falls Lower Village site that extends over three hundred feet north of Alvarado Creek. The portions of the stream channel, floodplain marsh area and designated wetlands buffer that occur on the SDSU Adobe Falls Lower Village site will also be preserved. Finally, Mitigation Measure BR-8 (DEIR, p. 3.3-77 – 78), states that buffer areas shall be further developed during final design. Mitigation measure BR-8 requires that a 100-foot buffer be maintained along the floodplain of Alvarado Creek.	
Comment S-5-1	Comments from Public Utilities Commission (Rosa Munoz), 7/20/2007	Response
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,	San Diego State University and the Board of Trustees of the California State University acknowledge the Commission's input and comment regarding safety factors to be considered in light of the proximity of the San Diego light	

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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.

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 (2 1 3) 576-7078 or at rxm@cpuc.ca.gov.

rail trolley to the SDSU campus. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.

SDSU wishes to point out, however, that with one limited exception there are no at-grade rail crossings in the vicinity of SDSU -- all rail tracks are located either above or below ground. The one exception is a 100-foot portion of at-grade track located on the eastern side of campus adjacent to parking structure 6. This area, however, is completely fenced from public access.

Comment S-6-1	Comments from Native American Heritage Commission (Dave Singleton),	Response
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: 1 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)/ <a href="http://www.ohp.parks.ca.gov/files/IC%20Roster.pdf">http://www.ohp.parks.ca.gov/files/IC%20Roster.pdf</a> The record search will determine:	As the Commission recommends, the South Coastal Information Center ("SCIC"), the local clearinghouse for the California Historic Resources Information Center, was contacted as part of the EIR analysis of potential impacts to cultural resources. The record search obtained from the SCIC is contained in the confidential appendix assembled by the EIR consultant.	
<ul style="list-style-type: none"><li>• If a part or the entire APE has been previously surveyed for cultural resources.</li><li>• If any known cultural resources have already been recorded in or adjacent to the APE,</li><li>• If the probability is low, moderate, or high that cultural resources are located in the APE.</li></ul>		

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- If a survey is required to determine whether previously unrecorded cultural resources are present.

Comment S-6-2	Comments from Native American Heritage Commission (Dave Singleton),	Response
<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological information center.</li> </ul>	<p>A professional archaeological inventory survey report was prepared, which provides the basis for the findings and recommendations made in EIR Section 3.4, Cultural Resources.</p>	
Comment S-6-3	Comments from Native American Heritage Commission (Dave Singleton),	Response
<p>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.</p> <ul style="list-style-type: none"> <li>• 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).</li> </ul>	<p>A Sacred Lands File search was requested from the NAHC on February 20, 2007. (Draft EIR p. 3.4-19.) The NAHC did not identify any sacred sites within one mile of the project center. At the request of the NAHC, letters were sent to representatives of local tribes requesting any information regarding sacred sites within the project area. None of the persons contacted identified any sacred lands within a mile of the project center. Nonetheless, a mitigation measure addressing the accidental discovery of any human remains on the site of the proposed project is proposed to reduce any potentially significant impacts.</p>	
Comment S-6-4	Comments from Native American Heritage Commission (Dave Singleton),	Response
<p>Lack of surface evidence of archaeological resources does not preclude their subsurface existence.</p> <ul style="list-style-type: none"> <li>• Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archaeological 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.</li> <li>• Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.</li> </ul>	<p>EIR Mitigation Measure CR-2 requires the preparation of an archaeological monitoring plan, which requires the presence of an archaeological monitor on the site to monitor the potential discovery of historical resources. In the event of an accidental discovery during grading activities, the monitor will have the authority to halt excavation at that location and direct that the discovery be evaluated immediately by a qualified archaeologist. (DEIR pp. 3.4-20 to 21.)</p>	
Comment S-6-5	Comments from Native American Heritage Commission (Dave Singleton),	Response

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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.

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.

Consistent with all applicable requirements, EIR Mitigation Measure CR-3 provides that in the event of the accidental discovery of human remains during any phase of project construction, the County Coroner is to be contacted and if the remains are Native American, the Coroner is to contact the NAHC in order to identify the most likely descendant. (DEIR p. 3.4-21.) Under certain specified conditions, SDSU is to rebury the remains with appropriate dignity on the property, in a location not subject to further subsurface disturbance.

Comment S-6-6	Comments from Native American Heritage Commission (Dave Singleton),	Response
Lead agencies should consider avoidance, as defined in 6 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.	Any significant cultural resources that may be within the project area are located outside the area of development. Mitigation is proposed to reduce any potentially significant indirect effects to a level below significant. (DEIR 3.4-9; 3.4-20.)	
Please feel free to contact me at (916) 653-6251 if you have any questions.		

Comment S-7-1	Comments from Governor's Office of Planning and Research (Terry Roberts),	Response
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.	San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
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."		
These comments are forwarded for use in preparing your final environmental		

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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.

Comment R-1-1	Comments from RWQCB, Southern Watershed Protection Unit (David Gibson), 7/27/2007	Response
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.	As suggested by the comment, the proposed project avoids impacts to waters of the U.S. where possible, minimizes impacts where they cannot be avoided, and proposes mitigation measures to reduce significant impacts to a level below significant. Additionally, the proposed project does not involve the paving over of natural creek beds, or the placement of creeks underground.	
Comment R-1-2	Comments from RWQCB, Southern Watershed Protection Unit (David Gibson), 7/27/2007	Response
<p>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.</p> <p>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). Predevelopment 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 receiving runoff from the project. If necessary, flow control measures should be implemented to avoid erosion of the channel.</p>	<p>Draft EIR section 3.7, Hydrology and Water Quality, analyzes the proposed project's impacts on hydrology and water quality, and is based on the Hydrology and Water Quality Technical report prepared by Dudek and Associates (May 2007). The Dudek report is included in Draft EIR at Appendix H. The EIR analysis is based on hydrology and water quality data relating to the proposed project site obtained through a review of pertinent literature (detailing the relevant aquifer characteristics, stream flow, and channel characteristics of the proposed project area and its surrounding vicinity), proposed site plans, and the Federal Emergency Management Agency's Flood Insurance Rate Maps. (DEIR p. 3.7-1.) The data was evaluated to identify existing drainage basins and flow characteristics, and the impacts of the proposed project on these systems. Conceptual peak flows were determined based on procedures outlined in the San Diego County Hydrology Manual. (DEIR p. 3.7-1.)</p> <p>Specific to the Adobe Falls Faculty/Staff Housing component, the analysis determined that development of the site would reduce on-site infiltration as a</p>	

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result of an increase in impervious surfaces in presently undeveloped areas that either drain to Alvarado Creek or naturally percolate into the soil. (DEIR p. 3.7-16.) DEIR Table 3.7-3, Peak Flow Summary, illustrates that, following project development, the peak flow rates of Alvarado Creek at the point where the creek leaves the Adobe Falls site would be increased by 2.5 cubic feet per second ("cfs") for an 85th percentile storm event (an 85th percentile storm event represents a "first flush" rain event), 4.38 cfs for a 2-year storm event, 7.13 cfs for a 10-year storm event, and 10.14 cfs for a 100-year storm event. (DEIR pp. 3.7-16 and 3.7-18.) The DEIR determined that the increase in runoff volumes for each storm event represented a potentially significant impact. (DEIR p. 3.7-16.) In response, the DEIR includes mitigation measure HWQ-2, which requires that prior to the preparation of final design plans for the Adobe Falls Faculty/Staff Housing Upper and Lower Villages, SDSU shall conduct a detailed site-specific hydrologic analysis to further assess the effects of the proposed project on the flood plain and, based on the analysis results, on-site detention facilities may be required. (DEIR p. 3.7-29.)

Although mitigation measure HWQ-2 does not specify such, the detailed site-specific hydrologic analyses to be conducted would include the preparation of hydrographs, which would depict flow throughout the duration of a storm and quantify the duration of flows, and the total volume of water. The preparation of meaningful hydrographs will be possible once specific site development information is available, information such as detailed civil engineering grading plans, site plans, drainage plans and calculations, and updated stream channel topography. The preparation of hydrographs prior to that time, based on less-specific data, would be a costly endeavor yielding limited information that would be required to be replaced by the detailed site-specific hydrologic analysis to be conducted pursuant to mitigation measure HWQ-2. However, in response to the comment, mitigation measure HWQ-2 will be revised to specifically require that hydrographs be prepared, and also revised to incorporate the specific performance criteria outlined in the comment in order to ensure avoidance of channel erosion. Revised mitigation measure HWQ-2, as it will appear in the Final EIR, follows below (bold text indicates new text; strikethrough text indicates deleted text):

HWQ-2 Prior to the preparation of final design plans for the Adobe Falls Faculty/Staff Housing Upper and Lower Villages, SDSU, or its designee shall conduct a detailed site specific hydrologic analysis to further assess the effects of the proposed project on the floodplain. The site-specific analysis shall include the preparation of hydrographs depicting flow throughout the duration of a storm, and quantify the duration of flows and total volume of



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water generated. The analysis also shall address the critical shear stress caused by the post-construction flow, and compare it to the stability threshold for the channel. Following the analysis, SDSU shall incorporate all necessary flow control measures such that post-development hydrology conditions are equivalent to pre-development peak flows, duration, volume, and velocity in order to control site erosion and avoid erosion of the channel. Based on the results of such analysis, on-site detention facilities may be required.

Comment R-1-3	Comments from RWQCB, Southern Watershed Protection Unit (David Gibson), 7/27/2007	Response
<p>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.</p> <p>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 <a href="http://www.sdcounty.ca.gov/dplu/LID PR.html">http://www.sdcounty.ca.gov/dplu/LID PR.html</a>. 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.</p> <p>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 <a href="mailto:carias@waterboards.ca.gov">carias@waterboards.ca.gov</a>.</p>	<p>Low Impact Development ("LID") concepts are based on strategically integrating stormwater controls throughout a project to mimic the natural hydrologic regime, thereby minimizing the project's need for treatment. Several LID concepts are included as mitigation measures for the proposed project components. For example, specific to the Adobe Falls project component, Mitigation Measure HWQ-1 specifies that Alvarado Creek and the nearby steep slopes should be preserved as open space. (Draft EIR pp. 3.7-28 to 29.) This would allow for continual natural percolation and drainage for all portions of the site that will remain undeveloped. Mitigation Measure HWQ-1 also states that community streets, sidewalks, and parking lot aisles should be constructed to the minimum widths necessary and incorporate landscape treatment for parking lot runoff. This would reduce the amount of impervious surfaces onsite so as to allow as much natural percolation as possible to mirror the existing, undeveloped state of the site. Similarly, the use of unit pavers, or an equivalent porous material, should be used to construct walkways, alleys and other low traffic areas. This is another mechanism to allow for maximum onsite percolation of water so as to mimic the existing pervious nature of the undeveloped site. Mitigation Measure HWQ-1 also states that existing native trees should be preserved onsite and the project's landscaping plans should utilize native trees to maximize canopy interception and water conservation. Rooftops can be channeled into adjacent landscaping prior to discharge into stormdrains which reduces the amount of runoff leaving the site which helps replicate the existing drainage pattern of the undeveloped site. Mitigation Measure HWQ-1 mandates that any manufactured slopes be vegetated with native or drought tolerant vegetation to replicate the existing environment. Finally, Mitigation Measure HWQ-1 notes that energy dissipaters should be installed at the outlets of new storm drains that enter Alvarado Creek. This will help slow water flow into the Creek so as to avoid unnatural scour.</p> <p>As indicated in Mitigation Measure HWQ-2, a detailed site-specific hydrologic analysis will be developed to further assess the effects of the proposed</p>	

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project on the floodplain. All structural post-construction BMPs that are selected in the site-specific hydrologic analysis (Mitigation Measure HWQ-2) will be designed to mitigate (infiltrate, capture, or treat) the volume of water generated by the 85th percentile storm event ("first-flush") as required by the numeric sizing treatment standards list in Storm Water Standards Manual. By following the Storm Water Standards Manual, the BMPs (outlined above) selected to mitigate the 85th percentile storm event will incorporate LID concepts.

Comment R-2-1	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
<p>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.</p>	<p>The comment is an introduction to comments that follow. No further response is required.</p>	
Comment R-2-2	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
<p>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.</p>	<p>The premise of the comment is incorrect. CEQA does not require that the traffic impacts analysis address whether the transit system has capacity limitations or is able to absorb the projected transit trips. (See, e.g., CEQA Guidelines Appendix G, Subparagraph XV, Transportation/Traffic [traffic issues relate to the capacity and level of service of the roadway network, the adequacy of parking capacity, the effect on emergency access, etc.].) In fact, to the contrary, the only criteria related to transit addresses whether the project would conflict with programs supporting alternative transportation such as transit.</p> <p>Additionally, CEQA does not define increased transit ridership as an "impact," nor does it provide applicable thresholds of significance to determine when such increased ridership would be "significant" within the meaning of CEQA, thereby requiring mitigation. Absent identification of a significant impact within</p>	

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the meaning of CEQA, no mitigation is required.

In addition to the absence of significance criteria in Appendix G of the CEQA Guidelines, neither SANDAG nor the City of San Diego has developed criteria that may be utilized to assess whether the proposed project would significantly impact transit services. Notably, SANDAG's own Congestion Management Program ("CMP") evaluates transit service through the consideration of: (i) the service level as measured by frequency or number of trips; (ii) the average travel speed or time; and (iii) the utilization of the service. (CMP, p. 25.) This methodology is not tied to the generation of additional transit riders by particular projects, but calls for a more broad brush approach to assessing transit service. Further, the CMP is applicable to local agencies; it is not, however, applicable to state agencies such as CSU. (CMP, p. 37.)

Moreover, to require a project proponent to "mitigate" increased transit ridership by paying for capital improvements to the transit system, as the comment letter requests, would be directly contrary to statewide land use and planning principles, which uniformly encourage the increased use of transit to reduce traffic impacts and related air quality impacts. In fact, the comments recognize this principle in that they ask SDSU to provide transit passes to all students through a special student assessment. Accordingly, the comments ask SDSU to take steps to further increase transit ridership, while at the same time contending that such increased ridership is an "impact" requiring mitigation. The inherent disincentive in this approach is counter to the fundamental principles of CEQA to reduce, not increase, environmental impacts.

In sum, any transit "impacts" that may result from the proposed project relating to increased transit ridership are not subject to CEQA analysis as they are not environmental impacts recognized under CEQA. Accordingly, if a transit impact analysis were to be undertaken, as the comment letter suggests, it would necessarily be conducted under a non-CEQA regime.

The comment implies that the focus of any such analysis would be on whether the proposed project contributes to transit ridership rates in such a manner that implementation of the proposed project would result in over-capacity. Accordingly, any analysis to be undertaken would entail assessing the transit service's ability to accommodate the additional riders.

SDSU is served by the Mission Valley East light rail transit extension ("Green

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Line"), which connects Mission Valley with inland communities. The Green Line opened for service in July 2005, and SDSU provided approximately \$1.5 million in right-of-way and capital projects funds. In addition, SDSU is continuing to contribute to the operating and security costs for the university station. (See response to comment R2-6 below for additional information regarding SDSU's contribution to the construction and operation of the SDSU trolley station.)

When preparing the Draft EIR for the 2007 Campus Master Plan Revision, SDSU's traffic consultant worked extensively with SANDAG to obtain existing and projected daily passenger trolley boardings at the SDSU station. (DEIR p. 3.14-33.) SANDAG estimated that 4,726 SDSU students, faculty and staff members presently ride the trolley to and from campus. (Ibid.) Based on future projections of passenger boardings at the SDSU trolley station provided by SANDAG, it is further estimated that by the year 2012, the number of SDSU trolley riders will increase by 1,943; and, by 2024-25, the number of trolley riders will increase by 6,898 over existing ridership rates. (Ibid.)

Notably, at no time during the traffic consultant's discussions with SANDAG was any concern expressed regarding future capacity associated with the Green Line. Furthermore, at present time, there is no evidence that the Green Line is operating at or near capacity due to SDSU ridership. SANDAG's comment letter provided no data or other documentation that the Green Line is operating over capacity, thereby resulting in physical deficiencies in the system. In fact, according to data recently released by SANDAG, the Green Line has the lowest ridership rates of its three trolley lines (the others are the Orange and Blue Lines). (See [http://www.lightrailnow.org/news/n\\_newslog2007q3.htm#SD\\_20070806](http://www.lightrailnow.org/news/n_newslog2007q3.htm#SD_20070806).) If, in fact, the Green Line is experiencing unanticipated "wear and tear," then it is incumbent upon SANDAG to alert SDSU and all users of the system to this fact, and to devise a fee impact program, prepared with the appropriate "nexus" study, and to implement such a program.

Related to this point is the fact that, as noted above, the projections of future ridership utilized in the EIR are based on SANDAG's own generated estimates. Therefore, it is reasonable to expect that because the source of the numbers is SANDAG, SANDAG is planning for the increased ridership and, this increased ridership has already been factored in to SANDAG's long-range plans for the system. Finally, there is no evidence that SANDAG will not be able to secure funding for any necessary transportation infrastructure programs through traditional funding sources at the local, state, and federal

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levels (e.g., the Transnet program; the State Transportation Improvement Program/Traffic Congestion Relief Program; the Federal Transit Administration discretionary funding).

Comment R-2-3	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
<p>The DEIR attempts to provide both a project-level analysis of near-term development impacts and a programmatic analysis of the impacts of campus improvement s 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 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.</p>		<p>The comment misinterprets the analysis presented in the Draft EIR. The Draft EIR analyzes certain project components at the CEQA project-level of review, and certain other components at the program level of review. (See, DEIR 1.0-7 to 8, and 1.0-35.) Specific to traffic impacts, the EIR traffic section analyzed the proposed project's impacts under both a near-term (2011/2012) and a horizon year (2030) scenario; however, each scenario was analyzed at the project-specific level. In this manner, the analysis identifies significant impacts and proposes mitigation to reduce the identified impacts for each scenario. (DEIR Section 3.14.13, Mitigation Measures, identifying near-term and horizon year significant impacts, and mitigation measures for each scenario.) Consistent with applicable law, CSU/SDSU's participation in the proposed mitigation is based on a fair-share contribution, calculated according to the formula routinely used by the City of San Diego. (DEIR p. 3.14-108 to 110.)</p>
Comment R-2-4	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
<p><b>Traffic Analysis</b></p> <p>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.</p> <p>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</p>		<p>The 2.47 trip rate for non-resident students utilized in the EIR traffic impacts analysis is based on a weeklong actual count at the SDSU Campus. The counts that determined this rate captured all deliveries, all pick-ups and drop-offs, all business trips, all carpools, all bus trips, and all other vehicle trips associated in any way with the campus. The road tubes which were used to conduct the counts were placed such that all trips were counted, not just trips that go to a parking lot. Thus, the methodology used to determine the trip rate captured all campus-related traffic. With respect to non-vehicle trips, bicycle and walk trips are not included in a vehicle trip rate calculation.</p> <p>The 0.64 trip rate used for resident students was determined using three methodologies. As explained on page 28 of the traffic technical report, EIR Appendix N, the highest rate from the three methodologies was used in the impacts analysis. The recently approved UCSD Master Plan EIR used a trip rate of 0.41 ADT per resident student. The 0.64 rate that was utilized in this case is a conservative (i.e., overestimates) rate.</p>

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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.

Comment R-2-5	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
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.	The amount of future campus trips forecasted to utilize the trolley is not "unsupported" and, in fact, is based on future boarding projections made by the commentor, SANDAG. (See DEIR pp. 3.14-33 to 34.) This data is the best available data to utilize in projecting future transit ridership. The trolley was extended to the SDSU campus in 2005 and there is no documentation implying that the system would be unable to accommodate forecasted usage in 2025, only 20 years after system completion. Please also see response to comment R2-2, above, regarding the impacts of growth on transit.	
Comment R-2-6	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
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 2 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.	Please see response to comment R2-2, above. Moreover, on June 30, 2006, upon completion of the SDSU trolley station, SDSU and the Metropolitan Transit System ("MTS") entered into two agreements -- the first addressed settlement of costs for trolley construction, and the second was an operational and maintenance agreement. The settlement agreement settled all construction related issues between SDSU and MTS wherein a significant portion of the trolley-related construction costs were absorbed by SDSU. The second agreement, the operational and maintenance agreement, contained provisions wherein SDSU granted to MTS an exclusive easement for bus, trolley and public transportation services. The agreement also contained provisions regarding advertisement and joint revenue generating activities mutually beneficial to both agencies.	
	The operational agreement addresses the maintenance, monitoring, and repair of improvements by which SDSU is responsible for the maintenance of the bus platform and areas surrounding the trolley station. Such maintenance includes aboveground electrical lighting and trash removal. MTS also was granted 10 parking spaces on campus. Security and Public Safety was also	

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discussed in the agreement wherein a memorandum of understanding between SDSU Public Safety and San Diego Trolley Police/Security was entered into deeming SDSU Public Safety responsible for law enforcement outside of the perimeter of the Light Rail Transit ("LRT") station, and including a mutual aid provision for crimes, arrests, fire and medical assistance and operations.

Significantly, the operational agreement contained the following provision with respect to SDSU's responsibility for future capital improvements at the station: "All future capital improvements to the LRT station at SDSU or BTC shall be at the sole cost and expense of MTS..." Thus, the agreement covers any and all future capital construction improvements contemplated for the LRT station and the bus platform, and precludes MTS/SANDAG from seeking any such capital improvement funding from SDSU.

Comment R-2-7	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
<p>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:</p> <ul style="list-style-type: none"><li>• an expansion or re-design of the bus transit center to accommodate more buses</li><li>• the installation of ticket vending machines and next-bus signs, which provide for some expansion of capacity through faster boarding and cycling of buses</li><li>• 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</li><li>• 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"</li><li>• shuttles to remote parts of campus and to nearby student housing.</li></ul>	<p>SDSU provides the following additional responses to SANDAG's request for capital improvements as mitigation for the purported impacts caused by the proposed 2007 Campus Master Plan Revision project:</p> <p>1. Provide a bus-only signal on College Avenue for a left turn from the transit center:</p> <p>This improvement was discussed by MTS and the SDSU Research Foundation during the private development contemplated for the construction of The Paseo due to the necessity for improved bus circulation as a result of the proposed closure of Lindo Paseo Avenue to the south. Since The Paseo project is not an active project, is on private land, and is not a part of the proposed project, SDSU can only join SANDAG and MTS in encouraging the completion of this improvement by the developer of The Paseo project in the future; SDSU itself is not responsible for this improvement.</p> <p>2. An expansion or re-design of the bus transit center to accommodate more buses.</p> <p>Future capital improvements to the LRT or bus platform, as stated above, are the responsibility of MTS by agreement.</p> <p>3. The installation of ticket vending machines and next-bus signs</p> <p>It is our understanding that both the bus platform and the LRT station contain these provisions, and, again, capital improvements, as stated above, are the responsibility of MTS.</p>	

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4. Enhanced shelter for the Mid-City Rapid Bus Terminal.  
Future capital improvements to the LRT or bus platform, as stated above, are the responsibility of MTS.

5. 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”.

Since the completion of the SDSU LRT station and bus platform, SDSU has cooperatively worked with MTS to encourage ridership and the use of public transit. During the first year of LRT operations, SDSU and MTS initiated a subsidized “College Pass,” which is sold during the first month of the semester. SDSU pays a \$20.00 subsidy to each rider, making the price of a transit pass approximately \$113/semester. This is 15% of the cost of a normal transit pass. Over 3,000 passes were sold during the first Fall semester of operations. During the second year of operations, 2006, ridership increased to over 4,500 students, and the subsidy continues to encourage students to utilize transit. In addition, a significant number of faculty and staff utilize public transit.

Based on the annual sales of SDSU parking permits, SDSU has seen a significant drop in parking permit sales as a result of the LRT station construction. In short, SDSU believes that the University has essentially contributed revenue to public transit by both subsidizing ridership, and by shifting revenue from parking permit sales to transit ridership.

SDSU proposes to continue to promote transit ridership and has discussed whether to implement a student fee for “free” transit, as the commentor suggests, or to increase parking permit fees to allow for more subsidized transit. Each of these methods will continue to be discussed with MTS and may be implemented in the future.

6. Shuttles to remote parts of campus or to nearby student housing.  
In 2000, SDSU implemented the Red-Black Shuttle bus service to transport students from remote parking lots to the core of the campus, and to provide for bus service throughout campus property. This system was necessitated by the activities underway with the construction of the LRT station and the lack of campus parking. During the period 2000/01, SDSU constructed Parking Structure 5 and followed that with construction of Parking Structure 6 in 2003/04. These structures added over 3,000 parking spaces to the campus inventory. During the construction of the LRT station, approximately 3,000 cars were temporarily out of service; thus, the net new parking spaces were



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not realized until 2005, coinciding with completion of the LRT construction.

The campus continued to operate the Red Black Shuttle bus throughout the 2005/06 fiscal year and ultimately reduced service when ridership faded due to the increase of public transit usage and the availability of convenient parking. At the end of service, the Red Black Shuttle bus was costing SDSU approximately \$11.00 per rider per trip. As of this date, a shuttle bus system operates Monday through Thursday from 5:00 p.m. to 10:00 p.m. In the future, as the campus expands, SDSU will consider expanding the Red Black shuttle to meet the transportation demand.

In addition, SDSU currently maintains a bus escort service for after hours pick-up and security, and there are campus shuttle buses which transport students, faculty and staff to the Alvarado Campus area. As physical expansion of the Alvarado Campus occurs, consideration will be given to an internal campus shuttle bus system and other improvements as part of an overall transportation demand management program. Additionally, with regard to the proposed Adobe Falls Faculty/Staff Housing development, following occupancy, shuttle service to the Adobe Falls site will be instituted. SDSU anticipates that the shuttle will reduce overall vehicle trips in the range of 10 to 20%.

Currently, several private apartment owners provide shuttle buses for students from their properties to SDSU. We have encouraged private apartment owners to provide these services as a convenience to students and a method whereby they will contribute to a reduction in traffic congestion. We continue to promote shuttle bus services with private developers who are interested in constructing student housing beyond one-half mile from campus. SDSU proposes as a part of the project the construction of additional housing on campus, and anticipates the construction of private student housing within one half mile of campus that will promote pedestrian and bicycle usage. We are also encouraging private developers to consider student housing along public transit corridors.

Comment R-2-8	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
The DEIR should also clearly identify and mitigate the plan's transportation impacts on Interstate 8 (1-8) and identify mitigation measures. Since the OEIR 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	The Draft EIR addresses the proposed project's impacts on Interstate 8 ("I-8") at sections 3.14.8.2.4 (near-term scenario) and 3.14.8.3.4 (horizon year scenario). With respect to mitigation, the comment that SANDAG supports Caltrans' mitigation requests made in its Draft EIR comment letter dated July 26, 2007 is noted, and will be included as part of the record and made available to San Diego State University and the Board of Trustees of the	

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to and cooperate in a Project Study Report (PSR) that will analyze how to accommodate increased traffic at 1-8 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 1-8 corridor, and be prepared to pay for traffic mitigations based on the study results.

California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. Please also see the CSU/SDSU responses to Caltrans' comment letter, identified in this report as Letter S1.

Comment R-2-9	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
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.		The Draft EIR traffic impacts section identified the potentially significant impacts to city streets that would result with implementation of the proposed project, and the EIR proposes as mitigation that CSU/SDSU contribute to the City of San Diego SDSU's fair-share of the costs to provide the necessary roadway improvements, subject to funding by the state Legislature. (DEIR pp. 3.14-102 to 108.) The fair-share percentage was calculated based on a formula routinely used by the City of San Diego. (See DEIR pp. 3.14-108 to 110.) With respect to the comment that improvements attributable to "Phase 1" of the project (near-term scenario improvements) should be fully funded and completed by SDSU, under CEQA, SDSU/CSU is not required to pay more than is necessary to mitigate the significant impacts of the proposed project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina, 39 Cal.4th at 361-362.) Please see General Response 3, City of Marina Compliance, for additional information responsive to this comment.
Comment R-2-10	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
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 SOSU campus. The campus should focus development around public transit and support a variety of 3 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.		<p>With respect to a balanced approach to mobility, SDSU currently supports the following transportation demand management activities:</p> <ol style="list-style-type: none"> <li>1. <input type="checkbox"/> SDSU subsidizes the "College Pass," which entitles students to unlimited transit rides for the entire semester. Faculty and staff may also purchase an unlimited monthly transit pass at a discount rate from MTS.</li> <li>2. <input type="checkbox"/> SDSU publishes and distributes to all students each semester an annual campus map with transit, carpool and other alternative modes information.</li> <li>3. <input type="checkbox"/> SDSU conducts the SDSU "School Pool" Rideshare Program, which is free to all students, faculty and staff through <a href="http://www.ridelink.com">www.ridelink.com</a>.</li> <li>4. <input type="checkbox"/> SDSU promotes trolley usage through <a href="http://www.sdcommute.com">www.sdcommute.com</a>.</li> <li>5. <input type="checkbox"/> SDSU provides vanpool vehicles through arrangement with Enterprise, Inc. for vanpool riders.</li> <li>6. <input type="checkbox"/> SDSU provides preferred parking for carpool and vanpool automobiles at select locations on campus.</li> </ol>

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7. □ SDSU provides the free Campus Escort Service, seven days a week, from dusk until dawn.
8. □ SDSU promotes and advertises MTS bus and trolley usage through 1-800-COMMUTE.
9. □ SDSU provides additional staff for specific Event Management, and at the beginning of each semester, to manage traffic around the College Area.
10. □ SDSU promotes bicycle usage through the provision of bicycle racks, storage sheds for bicycles, and campus pathways connected to the SD bicycle system.
11. □ SDSU provides public safety and other operational costs at the LRT and Bus Transit stations, as well as other bus stops on SDSU property.

While the Draft EIR proposes "fair share" payments to the City of San Diego for roadway improvements to mitigate the significant impacts identified in the EIR and no further mitigation is necessary, SDSU is aware that a balanced approach to mobility is desirable to achieve the overall goals of the proposed project. As such, SDSU is adding a mitigation measure to the EIR that will insure that SDSU continues to work toward a comprehensive Transportation Demand Management program. Since trolley ridership has not yet achieved its initial full potential, SDSU believes that such a comprehensive program is unnecessary in the near-term, and should be developed over the next five years. Therefore the following mitigation measure will be included in the Final EIR:

TCP-27 SDSU shall develop a campus Transportation Demand Management ("TDM") program to be implemented not later than the commencement of the 2012/2013 academic year. The TDM program shall be developed in consultation with SANDAG and the MTS and shall facilitate a balanced approach to mobility, with the ultimate goal of reducing vehicle trips to campus in favor of alternate modes of travel.

Comment R-2-11	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
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.		The comment is noted and will be included as part of the record and made available to the CSU Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project. However, those mitigation measures that include right-turn lanes are proposed to mitigate the project's identified significant traffic congestion impacts. The elimination of these improvements would result in increased vehicle miles traveled and corresponding increased air quality impacts. The TDM program to be developed by SDSU will address measures to reduce potential pedestrian/bicyclist/vehicle conflicts. Please see the response to comment

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R2-10, above.

Comment R-2-12	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
<p>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.</p>	<p>SDSU is aware of the City of San Diego Bicycle Master Plan. Any proposed improvements to the street network will include improvements as required by this master plan, and will preserve the existing bicycle facilities. Bicycle educational programs will be incorporated as part of the overall TDM. Please see the response to comment R2-10, above.</p>	
Comment R-2-13	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
<p>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.</p>	<p>The Adobe Falls Faculty/Staff Housing component of the proposed project includes a mitigation measure that requires the institution of shuttle service following development of the Lower Village, once the project's vehicle trip numbers reach certain levels. (See mitigation measure TCP-24.) The limited number of units to be developed as part of the first phase of the project, the 48-unit Upper Village, likely would not generate sufficient demand to warrant shuttle service.</p> <p>With respect to traffic calming, mitigation measure TCP-23 requires that SDSU prepare a traffic calming study following occupancy of the Lower Village, and that SDSU contribute its fair-share of the costs to implement the feasible traffic calming measures identified in the study. With respect to neighborhood parking protections, the Upper and Lower Villages will each be designed with the recommended number of parking spaces per unit and, therefore, there is no evidence to indicate that neighborhood parking protections would be necessary.</p>	
Comment R-2-14	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
<p>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 2S-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</p>	<p>SDSU agrees with the commentor and supports the development of a long term Campus Transportation Plan. SDSU will begin the process of starting a dialogue with SANDAG, MTS and other appropriate agencies to address various strategies of regional concern, consistent with the mitigation proposed above in the response to comment R2-10.</p>	

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basis for mitigation of long-term impacts of the Master Plan.

Comment R-2-15	Comments from SANDAG, Land Use and Transportation Planning (Robert A. Leiter),	Response
<p>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 the is 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.</p> <p>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.</p>		<p>The comment summarizes comments previously made in the letter. Specific responses to these comments have been previously provided. San Diego State University and the Board of Trustees of the California State University acknowledge SANDAG's input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.</p>
Comment L-1-1	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
<p>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.</p> <p>In addition, I have received feed back from community groups and individuals from the College and Navajo communities sharing my concerns.</p>		<p>The comment is an introduction to comments that follow. No further response is required.</p>
Comment L-1-2	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
<p>The following is a brief listing of my primary concerns and recommendations for SDSU which are described in greater detail on the following pages:</p> <p>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.</p>		<p>The EIR Alternatives analysis, in Section 5.4.1, analyzes the development of new, and the expansion of existing, off-campus centers. As discussed in the EIR, SDSU has in the past, and continues to, explore the establishment of off-campus centers in both the South Bay and East County San Diego regions. Included within this effort, SDSU has been in intermittent talks with Chula Vista officials about developing a satellite campus in that city for many years. However, as discussed further in Section 5.4.1, it is not presently feasible from a student demand perspective and, consequently, cost perspective, to develop a South Bay alternative.</p>

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Comment L-1-3	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
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.	Under the California Supreme Court's ruling in City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341, the court ruled that SDSU/California State University ("CSU") is required to request from the Legislature the funds necessary to mitigate the significant impacts caused by the proposed Campus Master Plan Revision. (39 Cal.4th at 367.) However, the court also ruled that CSU's power to mitigate the effects of the project is ultimately subject to legislative control; if the Legislature does not appropriate the money, then CSU does not have the power to mitigate the project's effects. (39 Cal.4th at 367.) Therefore, as the Draft EIR notes in the Transportation/Circulation and Parking section, SDSU's fair-share funding commitment towards the identified roadway improvements is necessarily conditioned upon 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. (Draft EIR p. 3.14-117.) The comment that SDSU should guarantee that the State of California Legislature will fund the required fair share mitigation measures before construction begins on each project component will be included as part of the record and made available to SDSU and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. Please also see General Response 3, City of Marina Compliance, for additional information regarding this subject.	
Comment L-1-4	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
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.	The referenced student housing financing feasibility report is still being prepared and is not yet complete. A substantial amount of work remains to be done on the report, and SDSU has discussed preliminary information regarding the report with the report's authors, and the report contains no significant new information that would alter the conclusions reached in the Draft EIR. It is not necessary to extend the Draft EIR comment period.	
Comment L-1-5	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
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.	The EIR traffic impacts analysis correctly determined that the carrying capacity of the Del Cerro roadways is 1500 average daily trips ("ADT"). Please see Topical Response 1, Del Cerro Roadway Classification, for additional information on this topic.	
Comment L-1-6	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response

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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.

The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.

Comment L-1-7	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
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.		The comment expresses the opinions of the commentator and will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. Please see General Response 2, Population and Housing Related Matters.
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.		

Comment L-1-8	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
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).		Please see Draft EIR Appendix O, last page, San Diego State University, Enrollment Planning Projections, 3% Annual Growth, for a review of SDSU's projected annual enrollment growth through 2024/25 by full-time equivalent student ("FTES") and headcount. Recent increases in the quality of students has created the tendency for increases in student preparation and increased unit loads, which provide a trend toward decreased headcount per FTES.
In reviewing the statistical data on the CSU website - <a href="http://www.calstate.edu/as/stat/reports/2006-2007/f06_01.htm">http://www.calstate.edu/as/stat/reports/2006-2007/f06_01.htm</a> , 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		The San Diego campus Fall 2006 unrebenched FTES was 27,631. The rebenched FTES was 28,438. The San Diego campus Fall 2006 headcount was 33,441. The numbers quoted in the question include enrollments at the Imperial Valley Campus (IVC) and FTES calculations that are rebenched FTES numbers, which include a graduate differential. IVC numbers are not relevant as IVC draws its student population from the Imperial Valley and is an

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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.

upper-division and graduate enrollment campus.

<b>Comment L-1-9</b>	<b>Comments from 7th District City Councilman Jim Madaffer, 7/27/2007</b>	<b>Response</b>
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.	The comment is incorrect. The Draft EIR addresses the potential traffic impacts of the proposed Campus Master Plan Revision in Section 3.14, Transportation/Circulation and Parking. The analysis identifies the significant traffic impacts that would be caused by the project, and includes mitigation measures in the form of roadway improvements, or "upgrades," that would alleviate the traffic congestion generated by future growth. Please see EIR Section 3.14.13, Mitigation Measures.	
<b>Comment L-1-10</b>	<b>Comments from 7th District City Councilman Jim Madaffer, 7/27/2007</b>	<b>Response</b>
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.	<p>The premise of the comment is incorrect. The entity that made the referenced "promises" is the San Diego State University Research Foundation, a separate entity from SDSU. The Foundation is a non-profit, auxiliary organization at SDSU, authorized by the State of California.</p> <p>With respect to the University's responsibility, the Draft EIR includes numerous mitigation measures to reduce the potentially significant impacts to the environment that would result with implementation of the 2007 Campus Master Plan Revision. Those mitigation measures include that SDSU, subject to funding by the state Legislature, contribute its fair-share for the costs to construct various roadway improvements made necessary by the proposed project. Under CEQA, SDSU/CSU is not required to pay more than is necessary to mitigate the identified significant impacts of the proposed project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341, 361-362.) The Draft EIR calculated the SDSU/CSU fair-share percentages according to the formula used by the City of San Diego. The formula, and resulting calculations, are shown at Draft EIR pp. 3.14-108 - 110.</p>	
<b>Comment L-1-11</b>	<b>Comments from 7th District City Councilman Jim Madaffer, 7/27/2007</b>	<b>Response</b>
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	Draft EIR mitigation measures TCP-7 and TCP-8 provide for the widening of Alvarado Road between East Campus Drive and 70th Street (on the south side) to two through lanes plus a two-way left turn lane. (Draft EIR pp. 3.14-	



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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.

102 and 103.) The mitigation measures do not require the elimination of existing legal on-street parking.

Comment L-1-12	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
<p>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".</p> <p>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.</p>	<p>The Draft EIR analyzes the project's potential impacts on emergency medical services, generally, and specific to Alvarado Hospital, at pages 3.13-27 through 3.13-29. The EIR determined that while the proposed project would increase vehicle traffic and congestion in the vicinity of SDSU, it is not expected that the increased traffic would result in significant impacts in the form of increased emergency response times. The EIR reached this conclusion based on the following reasons. First, emergency response vehicles have the right-of-way and are exempted from rules of the road in emergency situations. Therefore, surrounding traffic must yield the right-of-way and immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and stop until the emergency vehicle has passed. Second, the roadway configuration of Alvarado Road is such that there is adequate right-of-way for emergency vehicles to maneuver around traffic, even under congested conditions. Third, communications with emergency service providers in the area confirmed that emergency vehicles generally have the ability to go where they need to go in the event of an emergency, and in the event of traffic congestion have the ability to maneuver through the congestion. (Draft EIR pp. 3.13-28 - 29; see also, Transportation/Circulation and Parking, p. 3.14-98.)</p>	
Comment L-1-13	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
<p>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.</p>	<p>The overall objective of the Navajo Community Plan Residential Element 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 density range." (DEIR Table 3.8-3.) Specific to traffic, EIR Section 3.14 analyzed the potential impacts associated with the proposed Adobe Falls Faculty/Staff Housing development and determined that the proposed project would not result in significant traffic impacts. While the proposed project would add additional traffic to the existing roadways, which the commentator views as "overwhelming the current traffic counts," the existing roadways contain sufficient capacity to accommodate the additional traffic such that the roadways would continue to operate at acceptable levels of service even with the proposed project. (See Draft EIR pp. 3.14-69 - 70.) Therefore, the proposed project is not at odds with the objective to maintain and enhance the quality of the existing</p>	

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residences.

Comment L-1-14	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
<p>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 &amp; 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.</p> <p>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".</p> <p>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.</p>	<p>The EIR traffic impacts analysis correctly determined that the Del Cerro roadways are properly characterized as "residential local streets" with a carrying capacity of 1500 average daily trips ("ADT"), and not "low volume residential streets" with a carrying capacity of 700 ADT. Please see Topical Response 1, Del Cerro Roadway Classification, for additional information on this topic.</p>	
Comment L-1-15	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
<p>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.</p> <p>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.</p>	<p>The comment is incorrect; the current traffic counts (existing average daily trips (ADT)) on Adobe Falls Road is 410. (Draft EIR p. 3.14-26; 3.14-69.) As discussed in the response to comment L1-14 above, the Del Cerro roadways are properly characterized as "residential local streets" with a carrying capacity of 1500 average daily trips ("ADT"), and not "low volume residential streets" with a carrying capacity of 700 ADT.</p>	
Comment L-1-16	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
<p>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.</p>	<p>The comment restates information contained in the Draft EIR, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.</p>	

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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).

However, because the comment does not raise an environmental issue regarding the content of the Draft EIR, no further response is required.

<b>Comment L-1-17</b>	<b>Comments from 7th District City Councilman Jim Madaffer, 7/27/2007</b>	<b>Response</b>
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.		The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not raise an environmental issue regarding the content of the Draft EIR, no further response is required.
<b>Comment L-1-18</b>	<b>Comments from 7th District City Councilman Jim Madaffer, 7/27/2007</b>	<b>Response</b>
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 SDSU property. SDSU is negligent for failing to include these figures and must be provided.		Preliminarily, the development of any trails on the Adobe Falls site would not occur until development of the Lower Village. (See, e.g., Final EIR Mitigation Measure CR-4.) The Lower Village will be developed over the long-term, sometime beyond the year 20212, with no commencement date presently planned. (Draft EIR p. 1.0-36.) Accordingly, the Lower Village site was analyzed in the EIR at the program level of review, and development of the site will undergo additional CEQA analysis prior to project construction. During subsequent development phases, the Lower Village trail system will be designed, and any/all impacts associated with the trails will be assessed. However, it is presently contemplated that the trails to be developed on the Adobe Falls Lower Village site will be developed for use by the residents of the Adobe Falls Faculty/Staff Housing community, not for use by the general public. Therefore, with resident use of the trails, no additional vehicle trips would be generated. Moreover, even if the trails were available for public use, any vehicle traffic generated would be relatively minimal.
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.		
<b>Comment L-1-19</b>	<b>Comments from 7th District City Councilman Jim Madaffer, 7/27/2007</b>	<b>Response</b>
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.		The Draft EIR acknowledges that the proposed project would result in significant traffic impacts at the intersection of Del Cerro Boulevard and College Avenue under both the near-term and horizon year scenarios. (See Draft EIR pp. 3.14-63 and 3.14-74.) For that reason, mitigation is proposed under which SDSU would, subject to funding by the state Legislature, contribute its fair-share of the costs to provide the necessary roadway improvements at the intersection. (See mitigation measure TCP-1, p. 3.14-102.) Specific to the commentator's concern regarding traffic safety, mitigation

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measure TCP-23 requires the preparation of a Traffic Calming Study that would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue (Phoebe Hearst Elementary School and the Temple Emanuel school) to determine the methods available to control and/or reduce vehicle speeds in the area.

<b>Comment L-1-20</b>	<b>Comments from 7th District City Councilman Jim Madaffer, 7/27/2007</b>	<b>Response</b>
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."		Draft EIR Section 3.3 addresses the proposed project's impacts on biological resources. Mitigation measures are proposed that would reduce all potential impacts to a level below significant. (See Draft EIR pp. 3.3-72 through 3.3-79.) The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not raise an environmental issue regarding the content of the Draft EIR, no further response is required.
<b>Comment L-1-21</b>	<b>Comments from 7th District City Councilman Jim Madaffer, 7/27/2007</b>	<b>Response</b>
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.		The ambient background concentrations of the criteria pollutants utilized in the Draft EIR air quality analysis were taken from San Diego Air Pollution Control District ("SDAPCD") ambient monitoring stations located at San Diego 12th Avenue, Overland Avenue, and El Cajon. (Draft EIR p. 3.2-8 - 9.) The SDAPCD is charged with selecting the locations of the monitoring stations, and the air quality at the selected sites is representative of air quality levels throughout the County. Therefore, the monitoring station locations utilized for the EIR air quality analysis are sufficiently representative of the SDSU area, including the Adobe Falls Faculty/Staff Housing site, in that any variation in actual pollutant levels would be statistically insignificant.
<b>Comment L-1-22</b>	<b>Comments from 7th District City Councilman Jim Madaffer, 7/27/2007</b>	<b>Response</b>
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.		Responses to each of the comments raised by Everett and Associates regarding the Draft EIR biological resource impacts analysis have been prepared, and provided to the Del Cerro Action Council letter.
<b>Comment L-1-23</b>	<b>Comments from 7th District City Councilman Jim Madaffer, 7/27/2007</b>	<b>Response</b>

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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.

Under CEQA, SDSU/CSU is not required to pay more than is necessary to mitigate the identified significant impacts of the proposed 2007 Campus Master Plan Revision project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341, 361-362.) The Draft EIR calculated the SDSU/CSU fair-share percentages according to the formula used by the City of San Diego. The formula, and resulting calculations, are shown at Draft EIR pp. 3.14-108 - 110.

Comment L-1-24	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
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.	As noted in the Draft EIR Alternatives section, many of the redevelopment projects in the Grantville Redevelopment Area are already in the planning stages and do not include housing for SDSU faculty and staff. Future consideration of the Grantville area for redevelopment as faculty/staff housing may occur, although that decision is out of the purview of SDSU, and would need to be considered by the City's Redevelopment Agency. (Draft EIR pp. 5.0-3 to 4.)	
Comment L-1-25	Comments from 7th District City Councilman Jim Madaffer, 7/27/2007	Response
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.	San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
Comment L-2-1	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
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.	The comment is an introduction to the comments that follow and no further response is required. However, in response to the statement referring to the City of San Diego as a "responsible agency," the reference is incorrect as the City is not a responsible agency relative to the proposed project. Under CEQA, the term "responsible agency" includes all public agencies other than the lead agency, which have discretionary approval power over the project. CEQA Guidelines §15381. The proposed project in this case is the San Diego State University 2007 Campus Master Plan Revision, which is to be approved by the Board of Trustees of the California State University. The City does not have discretionary approval power over the project (i.e., no discretionary approvals are necessary from the City) and, therefore, the City is	

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not a "responsible agency" within the meaning of CEQA. (See DEIR p. 1.0-63.)

Comment L-2-2	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
<p>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.</p>		<p>The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.</p>
Comment L-2-3	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
<p>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.</p>		<p>Specific responses to the comments of Mr. Qasem are provided below, at L2-6 through L2-25.</p>
Comment L-2-4	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
<p>It is also 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:</p> <p>" . . . 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)</p> <p>This approach relies on a faulty interpretation of City of Marina v. Board of Trustees of the California State University, 39 Ca1.4th 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</p>		<p>As explained in detail below, CSU/SDSU respectfully disagrees with the City's interpretation of the California Supreme Court's ruling in City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341 and, accordingly, the DEIR is not "fatally flawed" as the comment contends.</p> <p>In City of Marina, supra, 39 Cal.4th at p. 355, the California Supreme Court reviewed a decision by the Board of Trustees of the California State University to certify an EIR related to an expansion plan for its Monterey Bay campus. The Board of Trustees, despite finding significant impacts to off-site roads and fire services, had determined not to contribute funds to mitigate these impacts because: (i) mitigation was legally infeasible; (ii) another agency was responsible for providing mitigation; and (iii) overriding considerations justified certification of the EIR. (Ibid.) The Supreme Court rejected this analysis, and held that the Board of Trustees was responsible for mitigating environmental impacts generated by their projects.</p> <p>In reaching this conclusion, the Supreme Court articulated the scope of the mitigation obligation it was imposing:</p>

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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.

"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

"CEQA also provides that '[a]ll state agencies . . . Shall request in their budgets the funds necessary to protect the environment in relation to problems caused by their activities.' [Citation.] Thus, as we have also explained, if the Trustees cannot 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.

To be clear, we do not hold that the duty of a public agency to mitigate or avoid significant environmental effects [citation], combined with the duty to ask the Legislature for money to do so [citation], will always give a public agency that is undertaking a project with environmental effects shared responsibility for mitigation measures another agency must implement. . . . Moreover, a state agency's power to mitigate its project's effects through voluntary mitigation payments is ultimately subject to legislative control; if the Legislature does not appropriate the money, the power does not exist."

(*Id.* P. 367, italics added.) Accordingly, the Supreme Court concluded that the Board of Trustees' mitigation obligation is coextensive with its "statutory obligation" to seek funds from the Legislature -- if the request for funds is denied, the obligation expires; if the request for funds is granted, the obligation remains active and mitigation payments to third parties must follow. (*Ibid.*)

The SDSU 2007 Campus Master Plan Revision Draft EIR ("DEIR") was prepared with the City of Marina legal framework in place. Accordingly, when assessing impacts to traffic and circulation, the DEIR provided a series of mitigation measures that require CSU/SDSU to contribute to the City of San Diego its "fair share" of the costs required to improve existing infrastructure and create new infrastructure, as needed. (Final EIR pp. 3.14-101 to 3.14-113.) The terms of these mitigation measures are consistent with the "statutory obligation to ask the Legislature for the necessary funds" identified in *City of Marina*, supra, 39 Cal.4th at p. 367. Further, the draft EIR's conclusion that impacts related to traffic and circulation would be significant and unavoidable in light of the potential for the Legislature to deny funding requests, or to grant less funding than requested, or to delay receipt of the funds is consistent with the Supreme Court's acknowledgement that where "the Legislature does not appropriate the money, the power [to mitigate] does not exist." (*Ibid.*; see Final EIR p. 3.14-120.)

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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 "...after 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.

The comment contends that this cautious approach (i.e., one that assumes the funds requested will not be provided, and thus concludes that the impact is significant and unavoidable) is inadequate under CEQA because the applicable mitigation measures are rendered illusory due to the contingency of their application upon the Legislature's grant of the Board of Trustees' request for funds. However, this comment is misplaced in light of the legal framework set forth in City of Marina, supra, and excerpted above.

The comment relies exclusively on the concurring opinion issued in City of Marina, supra, 39 Cal.4th at pp. 370-373, by Justice Chin. In his concurring opinion, as noted by the City Attorney's comment, Justice Chin asserted that the majority's limitation on the mitigation obligation, discussed above, is dictum. (Id. At p. 372.) Justice Chin also expressed his opinion that "even were the Trustees to make, and the Legislature to reject, a specific appropriation request regarding the off-campus improvements here at issue, the Trustees would have 'the power' to make contributions" to facilitate mitigation efforts. (Id. At p. 372-373.) The comment's reliance on Justice Chin's concurring opinion is misplaced for three reasons: (i) the scope of the mitigation obligation articulated in the majority opinion is not dictum; (ii) even if the discussion is dictum, it constitutes persuasive authority; and (iii) a "stand alone" concurring opinion has no precedential value. Each is further discussed below.

First, Justice Chin's cursory analysis of the distinction between dictum and ratio decidendi -- the principle or rule that constitutes the grounds for the decision -- does not conclusively resolve the precedential value of the contested portion of the majority opinion. As a general proposition, "[l]anguage used in any opinion is of course to be understood in the light of the facts and the issue then before the court, and an opinion is not authority for a proposition not therein considered." (Ginns v. Savage (1964) 61 Cal.2d 520, 524, fn.2.) Contrary to Justice Chin's statement, the Supreme Court's assessment of the scope of the Board of Trustees' mitigation obligation is a central component of its review of whether mitigation was rightly found infeasible upon certification of the EIR. Accordingly, the Supreme Court consciously chose to delineate precisely what is required to comply with CEQA's mitigation requirement. The scope of the mitigation obligation was not a mere afterthought of the Supreme Court, but part of a continuous analysis relating to the specific facts of the case and in response to arguments raised in the parties' briefs. Therefore, this portion of the decision is not dictum, but binding authority issued by the most high court in the State of California.



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Second, even if the discussion is determined to be dictum, the analysis provided therein still has precedential value. "Our Supreme Court's decisions bind us, and [even] its dicta command our serious respect." (Sheeler v. Greystone Homes, Inc. (2003) 113 Cal.App.4th 908, 919, fn. 6.) Similarly, "dictum, while not controlling authority, carries persuasive weight and should be followed where it demonstrates a thorough analysis of the issue or reflects compelling logic." (Smith v. County of Los Angeles (1989) 214 Cal.App.3d 266, 297.) Some courts have even stated that their review is "squarely controlled" by dictum in another case, and thereby have limited the scope of their own review. (Hickman v. Mulder (1976) 58 Cal.App.3d 900, 902.) The case law referenced above supports SDSU's decision to rely on the Supreme Court's assessment of the scope of their mitigation obligation, even if the assessment is found to be dictum.

Third, it is not appropriate for the City Attorney to rely on Justice Chin's concurring opinion, which was not endorsed by any of the other members of the bench. A concurring opinion establishes neither binding nor persuasive authority, and should not be relied upon in the absence of a majority of the bench's consensus:

"A concurring opinion does not constitute authority under the doctrine of stare decisis. The majority opinion, not the minority, states the law and constitutes the decision of the court which binds lower courts. [Citation.] The statements in the dissenting or concurring opinions of individual justices which do not have the concurrence of a majority of the justices are not precedent, and constitute only the personal views of the writer."

(People v. Super. Ct. (1976) 56 Cal.App.3d 191, 194; see also People v. Byrd (2001) 89 Cal.App.4th 1373, 1383 ["Preliminarily, we note that 'no opinion has value as a precedent on points as to which there is no agreement of a majority of the court.'"].) Accordingly, the draft EIR rightly relied upon the majority opinion for guidance in analyzing and assessing the scope of its mitigation obligations under CEQA.

In light of the above, SDSU has not "disingenuously attempt[ed] to dodge true responsibility by relying on dicta." The decision rendered by the California Supreme Court in *City of Marina*, supra, clearly limits the obligations of public agencies to secure mitigation funds. This decision confirms that where a request to the California Legislature has been made, the obligation under Public Resources Code section 21106 that agencies "request in their budgets

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the funds necessary to protect the environment in relation to problems caused by their activities" is satisfied. Therefore, the draft EIR is not inadequate in this regard.

In addition to the response provided herein, SDSU has prepared a detailed summary documenting the University's compliance with the California Supreme Court's ruling in the City of Marina case. Please see General Response 3, City of Marina Compliance, for this additional information responsive to the comment.

<b>Comment L-2-5</b>	<b>Comments from City of San Diego, City Attorney (Marianne Greene),</b>	<b>Response</b>
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.		The SDSU 2007 Campus Master Plan Revision Draft EIR was circulated for a 45-day public comment period, beginning June 12, 2007, through July 27, 2007. CSU/SDSU will respond to all comments received during the noticed comment period, but is not required under CEQA to respond to late comments, i.e., comments received after the close of the public comment period. (CEQA Guidelines §15088(a).) However, this comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.
<b>Comment L-2-6</b>	<b>Comments from City of San Diego, City Attorney (Marianne Greene),</b>	<b>Response</b>
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.		The comment does not provide an explanation for the statement that the trip generation for the proposed project is "unreasonably low." Therefore, CSU/SDSU is not able to provide a detailed response specific to the commentor's concern. However, in sum, the trip generation rate utilized for the increased student enrollment is based on actual traffic counts conducted at the SDSU campus during November 2006. (DEIR p. 3.14-32.) The trip generation rates utilized for the Adobe Falls Faculty/Staff Housing, and the Alvarado Hotel project components are based on published City of San Diego rates. (DEIR pp. 3.14-32 to 33.) The adjustment for trolley ridership is based on SANDAG forecasts of future ridership. (DEIR pp. 3.14-33 to 34.) In addition, it should be noted that the trip generation forecast for the proposed project is, in fact, overstated in several areas, as described below:  1. The SANDAG trip generation rate was utilized for the hotel. This rate was used despite the fact that a large portion of the hotel patrons will be associated with SDSU itself since the hotel is located on campus. This will result in many trips that would otherwise need to drive being able to instead walk or use public transit. In addition, many of the employee trips will be able to use public transit. The SANDAG trip rate assumes the hotel is not SDSU-

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related and not located in very close proximity to public transit. The conservative 1,200 ADT hotel trip amount used in the traffic study is in reality expected to be only one half of this amount (600 ADT).

2. The trip rate for non-resident (off-campus) students was determined by placing tube counters at all entrances to the campus. Therefore, the rate includes all faculty and staff trips. However, the traffic generated by the Adobe Falls portion of the project, which will house faculty and staff, was fully added to the street system which in effect double counts the faculty trips that will live in Adobe Falls. (This was done in order to show the full amount of traffic which will be added to the residential roads around Adobe Falls). The trips generated by the Adobe Falls project was estimated to be 1,376 in the traffic study and due to the double counting, the actual new trips generated by Adobe Falls on a regional basis is expected to be only one-half of this number (688 ADT).

3. The Adobe Falls project was assumed to generate 8 ADT per unit, the City rate for condominiums. Since the development will be used for faculty housing with many units occupied only by 1 faculty member, the rate is expected to be much less. To verify this assertion, a 5-day count was conducted at the Cal State Fullerton faculty housing development on Lake Knoll Drive in the City of Buena Park; a development similar to what is proposed at Adobe Falls. This development is located about five miles from the campus. The trip rate was found to be 3.75 ADT per unit. Therefore the ADT generated by the Adobe Falls portion of the project is believed to be overstated by 731 ADT.

4. As stated in #1 above, the non-resident trip rate was obtained by placing tubes at all entrance to the campus. However, there are some resident students who live on campus that drove over the tubes when entering and exiting the campus, the non-resident trip rate is overstated. It was not possible to segregate resident traffic from non-resident traffic and therefore, it was not possible to quantify the reduction that should be applied to the tube counts to account for resident trips increasing the tube counts. The non-resident trip rate was not reduced to account for this phenomena and therefore the trip forecast is overstated.

Comment L-2-7	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
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.		The comment is incorrect. The former Paseo project is "on hold" and is not a part of the proposed 2007 Campus Master Plan Revision project, nor does the proposed project "mix in" some of the former Paseo project. Accordingly, it would be inaccurate to include the former Paseo project trips as part of the current project, with mitigation of traffic impacts shared between the two. As the Draft EIR notes in Table 2.0-1, the former Paseo project presently is "on-hold"; SDSU presently is re-assessing the viability of the former project in light

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of changing circumstances, and it is uncertain what will result on the property. However, because it is reasonable to expect that a Paseo-like project eventually will be developed on the former site, the Draft EIR includes the former Paseo project as a Horizon Year cumulative project in the traffic analysis in order to account for the future vehicle trips that would be generated by a project of this nature. (DEIR pp. 3.14-53 to 54.)

Comment L-2-8	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
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.	The classification of the Del Cerro roadways in the traffic impact analysis as "residential local streets" with a maximum capacity of 1500 ADT, rather than as "low volume residential local streets" with a capacity of 700 ADT, is based on an assessment of actual on-site roadway conditions, and is consistent with the City of San Diego Street Design Manual, the City Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.	
Comment L-2-9	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
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.	<p>The comment is correct that there are six intersections, five street segments, and four freeway segments located within the project study area that are presently operating at poor or failing levels of service. These locations are noted in Draft EIR Tables 3.14-7, 3.14-8, and 3.14-11. Each of these locations currently operates at LOS E or LOS F. The following is a list of the referenced locations:</p> <p>Intersections</p> <ul style="list-style-type: none"> <li>•Fairmount Avenue/I-8 westbound off-ramp/Camino del Rio N</li> <li>•Fairmount Avenue/I-8 eastbound off ramp</li> <li>•55th Street/Montezuma Road</li> <li>•College Avenue/Del Cerro Blvd</li> <li>•College Avenue/Canyon Crest Drive</li> <li>•College Avenue/Zura Way</li> </ul> <p>Segments</p> <ul style="list-style-type: none"> <li>•Alvarado Road (Reservoir Drive to 70th Street)</li> <li>•College Avenue (I-8 eastbound ramps to Zura Way)</li> <li>•College Avenue (South of Montezuma Road)</li> <li>•Montezuma Road (Fairmont Avenue to Collwood Blvd)</li> <li>•Fairmount Avenue (Montezuma Road to I-8)</li> </ul> <p>Freeways</p>	

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- Interstate 8 (Fairmount Avenue to Waring Road)
- Interstate 8 (Waring Road to College Avenue)
- Interstate 8 (College Avenue to Lake Murray Blvd)
- Interstate 8 (Lake Murray Blvd to Fletcher Parkway)

The Draft EIR impacts analysis determined that the proposed project would result in significant impacts at all of the above locations except two. (See Draft EIR Section 3.14.13.1.) The addition of project traffic would not increase the delay or vehicle/capacity ratio by more than the designated City significance threshold at these two locations (Fairmount Ave/I-8 eastbound off ramp intersection and the Fairmount segment). Therefore, the project would not result in significant impacts at these two locations and no mitigation is required under CEQA. As to the other 13 locations, where the project would result in significant impacts, mitigation is required and is included in the Draft EIR. (See Draft EIR Section 3.14.13, pp. 3.14-99 to 108.

Comment L-2-10	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
5. Section 5.3, Existing Ramp Meter Operations, must include an analysis of the observed meter rates and the observed queue lengths.	The Draft EIR traffic impacts analysis utilized two methodologies for the ramp meter analysis -- the fixed rate and the maximum delay method. (DEIR p. 3.14-13.) The fixed rate method provides an analysis of worse case conditions. Therefore, providing data regarding observed rates is not warranted.	
Comment L-2-11	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
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.	As discussed in the response to comment L2-7 above, the former Paseo project is not a part of the proposed 2007 Campus Master Plan Revision project, nor is "a part" of the former Paseo included in this project.	
Comment L-2-12	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
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.	Draft EIR Appendix N, page 28, depicts the calculations that were made to determine the appropriate trip generation rate to be applied to resident (i.e., non-commuter) students. The resident student trip generation rate used in the SDSU EIR traffic impacts analysis was estimated using two different sources -- the College Community Redevelopment Project EIR (July 1993; SCH 92091036), and the UCSD Master Plan EIR. Specific to the comment, this response focuses on the Redevelopment EIR methodology.	

Table 5.14 from the Redevelopment EIR, Trip Generation (Future Land

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Uses), utilizes two rates, 3.1 ADT per housing unit and 4.4 ADT per housing unit, depending on the location/type of resident housing (Core 3.1; 55th Street 4.4). However, this rate does not take into account the trip reductions which will occur due to the relocation of students to the campus. The Redevelopment EIR discusses on Page 5.10-9 that a trip reduction factor needs to be applied to account for "SDSU faculty, staff and students who now commute but are expected to relocate to occupy the residential development proposed within the project area." Redevelopment EIR Table 5-16 shows that this reduction is 2.8 ADT per unit.

Based on the Redevelopment EIR, the net new trips per housing unit would range from 0.3 (3.1-2.8) to 1.6 (4.4-2.8) ADT per housing unit. The next step is to convert this "per unit" rate to a "per student" rate. Based on SDSU data, the average number of students per campus housing unit is 2.50. Therefore, based on the trip generation rates utilized in the Redevelopment EIR, the ADT per resident student would range from 0.12 to 0.64 ( $0.3/2.5 = 0.12$ ;  $1.6/2.5 = 0.64$ ). The traffic study utilized the higher of these two values (0.64) in the trip calculations in order to be conservative. Since the Redevelopment EIR utilized the 2.8 ADT per unit reduction for SDSU resident students, it is appropriate for the SDSU EIR also to utilize this reduction. Lastly, as a check on the calculated resident student trip rate of 0.64, the UCSD Master Plan EIR was reviewed; that EIR used a resident trip rate of 0.41. The rate of 0.64 is 56% higher than the rate used in the UCSD EIR, further indicating the appropriateness of the 0.64 rate.

Comment L-2-13	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
<p>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.</p>		<p>The "assumption" made in the EIR traffic impact analysis that further reductions in traffic due to increased trolley ridership will occur in the future is based on specific ridership forecast data provided by the San Diego Association of Governments ("SANDAG"). As explained in the Draft EIR at pages 3.14-33 to 34, in order to determine the extent to which transit ridership, particularly ridership on the San Diego Trolley, would affect future vehicle trips generated by SDSU, LLG worked extensively with SANDAG to obtain existing and projected daily passenger trolley boardings at the SDSU station. The existing number of daily passenger boardings is 5,982. SANDAG forecasts there will be 7,909 daily passenger boardings at the SDSU trolley station in the year 2010, 9,242 boardings in the year 2015, and 17,450 boardings in the year 2030. (See Draft EIR Appendix N, Appendix H-1.) Based on these numbers, SANDAG forecasts 8,442 daily passenger boardings in the year 2012/2013, and 14,714 daily passenger boardings for the year 2024/2025.</p>

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According to SANDAG, 21% of the boardings at SDSU are transfers and, therefore, passengers not originating travel at SDSU. (See Draft EIR Appendix N, Appendix H-1.) Therefore, based on SANDAG projections, 79% of the passenger boardings at the SDSU trolley station are trips originating at SDSU. SANDAG estimates, based on these numbers, that 4,726 SDSU students, faculty and staff members presently ride the trolley to and from campus. (See Draft EIR Appendix N, Appendix H-1.)

As shown on Draft EIR Table 3.14-14A, Year 2012 (Near-Term) Project Trip Generation, and Table 3.14-15A, Horizon Year Project Trip Generation, 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. However, SANDAG 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. (See Draft EIR Table 3.14-14B.) By the year 2024-25, SANDAG projects that the number of SDSU trolley riders will increase over existing ridership by 6,898 trolley riders to 11,624. Therefore, between now and 2024-25, during the same period when the SDSU student headcount will increase from 33,441 to 44,826, SANDAG estimates that trolley ridership will increase by 6,898 SDSU students, faculty and staff over existing numbers. (See Draft EIR Table 3.14-15B.)

In order to account for this intermediate- and long-term increase in SDSU related trolley ridership, and the corresponding future shift from vehicle trips to trolley trips that will result in fewer vehicles on the roadways, the 2012 and 2024-25 trip generation projections for the proposed project have been adjusted to account for the reduced vehicle trips due to the increased trolley ridership.

To translate transit usage into vehicle trips, a vehicle occupancy rate of 1.2 people per car was utilized, based on an LLG survey conducted in May 2000. Therefore, by project buildout year 2024/25, the one-way traffic that would shift to the trolley is 5,748 trips ( $6,898 \text{ students} \div 1.2 \text{ people/car}$ ). (See Draft EIR Table 3.14-15B.) A five (5) % factor is applied to this amount to account for the fact that some of the shift to the trolley would be from other transit opportunities and not from personal vehicles. (See Draft EIR Table 3.14-15B.) Therefore, the one-way traffic that would shift to the trolley by the year 2024/25 is 5,460 trips. (See Draft EIR Table 3.14-15B.) This number is

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multiplied by 2 to convert it to an ADT, which equates to a 10,920 ADT shift by the year 2024/25. (See Draft EIR Table 3.14-15C.) A similar calculation was completed for 2012/2013 and the shift to the trolley was calculated to be 3,076 ADT. (See Draft EIR Table 3.14-14C.)

As shown on Draft EIR Tables 3.14-14C and 3.14-15C, taking into account the forecasted increase in trolley ridership, the net increase in ADT that would result from the proposed project is 2,531 ADT by the year 2012, and 12,484 ADT by the year 2024-25.

Comment L-2-14	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
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.	<p>As discussed in the response to comment L2-8, the classification of the Del Cerro roadways in the traffic impact analysis as "residential local streets" with a maximum capacity of 1500 ADT, rather than as "low volume residential local streets" with a capacity of 700 ADT, is based on an assessment of actual on-site roadway conditions, and is consistent with the City of San Diego Street Design Manual, the City Traffic Impact Study Manual, and the Navajo Community Plan.</p> <p>Additionally, the applicable City thresholds are based on resulting roadway capacity and not percentage increase. As discussed in DEIR section 3.14.8.2.2, with the addition of project traffic, all of the roadway segments in the Del Cerro community would operate within the acceptable capacity limits, and within the City's assigned acceptable levels of service. (DEIR p. 3.14-69.) Therefore, even if the project would substantially increase traffic relative to the existing traffic load, the roadways have sufficient available capacity to accommodate the increased traffic and the project would not result in a significant impact within the meaning of CEQA.</p> <p>This determination is consistent with the City of San Diego's Significance Determinations Threshold report dated January 2007, which utilizes thresholds where there is no limit to the % increase a project can cause without having a significant impact, provided the post-project traffic remains within the LOS D capacity of the roadway (i.e., acceptable conditions), as is the case here. A copy of the City's Significance Determinations Threshold report dated January 2007 is included in Final EIR, Appendix N-1.</p> <p>It is also noted that based on a survey of the 19 jurisdictions located within the County of San Diego conducted by Linscott, Law &amp; Greenspan, LLG, traffic engineers, none of the jurisdictions within the County utilize a "percent increase" threshold to determine traffic impact significance for those instances</p>	



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in which the post-project traffic is within the roadway's design capacity.

<b>Comment L-2-15</b>	<b>Comments from City of San Diego, City Attorney (Marianne Greene),</b>	<b>Response</b>
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.	Relocation of the Adobe Falls Faculty/Staff Housing project component to the central campus would not meet one of the project objectives, which is to utilize the Adobe Falls site to provide affordable housing for faculty/staff, and would leave the property underutilized and unproductive.  Additionally, because the proposed Adobe Falls Faculty/Staff Housing would not result in significant impacts to the Del Cerro residential roadways, relocation of the project component to relieve local traffic congestion is not necessary. Moreover, as discussed in the EIR Alternatives section, under the "No Adobe Falls Alternative," the proposed project still would result in significant impacts at the Del Cerro Boulevard/College Avenue intersection due to the additional vehicle trips generated by the increased student enrollment and Alvarado Hotel. (See DEIR p. 5.0-22.) Therefore, the elimination or relocation of the Adobe Falls Faculty/Staff housing would not avoid the identified potentially significant impacts.	
<b>Comment L-2-16</b>	<b>Comments from City of San Diego, City Attorney (Marianne Greene),</b>	<b>Response</b>
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 Santee/ITE Guidelines for Traffic Impact Studies in the San Diego Region dated March 2, 2000.	The impacts associated with each of the four required scenarios were analyzed in the Draft EIR. (See DEIR Section 3.14.5 [Existing conditions]; Section 3.14.8.2 [Near term (2012) existing + other pending projects + 2012 project]; Section 3.14.8.3 [Horizon year (2030) existing + other pending projects + project buildout]. (See also, DEIR Appendix N, Tables 5-1, 9-6 and 10-1.) The existing + project scenario was included for informational purposes only. (DEIR Section 3.14.8.1.)	
<b>Comment L-2-17</b>	<b>Comments from City of San Diego, City Attorney (Marianne Greene),</b>	<b>Response</b>
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.	The comment is correct and mitigation is proposed. The EIR traffic impacts analysis identified significant impacts at the northbound College Avenue to eastbound I-8 ramp meter due to excessive queues. (DEIR Sections 3.14.8.2.3 and 3.14.8.3.3.) Mitigation measure TCP-10 requires that SDSU support Caltrans in its efforts to obtain funding from the state Legislature for the fair-share of the costs to provide an additional single occupancy vehicle storage lane on the I-8 eastbound on-ramp from College Avenue (northbound).	
<b>Comment L-2-18</b>	<b>Comments from City of San Diego, City Attorney (Marianne Greene),</b>	<b>Response</b>
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	Access to the proposed Adobe Falls Faculty/Staff Housing Lower Village via the existing SmokeTree development is proposed as an alternate access	

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impacts.

route. See DEIR Section 5.6, Adobe Falls Alternate Access Routes. Under this alternate, the traffic impacts analysis determined, based on a field review, there is capacity for approximately 1,500 additional ADT, which means that the maximum number of units that could be built using the SmokeTree private driveway would be approximately 185 units. (DEIR Appendix N, p. 80.)

<b>Comment L-2-19</b>	<b>Comments from City of San Diego, City Attorney (Marianne Greene),</b>	<b>Response</b>
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.	The EIR traffic impacts analysis analyzes the potential impacts of the project that is presently proposed, and is based on current traffic conditions. The comment regarding review of the 1993 EIR for details regarding the traffic mitigation is noted.	
<b>Comment L-2-20</b>	<b>Comments from City of San Diego, City Attorney (Marianne Greene),</b>	<b>Response</b>
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.	The mitigation measure fair share contributions depicted in EIR Tables 3.14-36 and 3.14-37 were calculated according to the formula routinely used by the City in calculating fair-share contributions. Under CEQA, SDSU/CSU is not required to pay more than is necessary to mitigate the significant impacts of the proposed project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina, 39 Cal.4th at 361-362.) The City also does not provide any documents or data to substantiate its position that "there are no other near term projects" that could contribute toward mitigation except the separate Paseo project, which is "on hold."	
<b>Comment L-2-21</b>	<b>Comments from City of San Diego, City Attorney (Marianne Greene),</b>	<b>Response</b>
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.	Please see the response to comment L2-15 above.	
<b>Comment L-2-22</b>	<b>Comments from City of San Diego, City Attorney (Marianne Greene),</b>	<b>Response</b>
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.	The analysis reflected in EIR Appendix N Tables 16-1 and 16-2 (DEIR Tables 3.14-36 and 3.14-37) is correct. As discussed in the response to comment L2-6 above, the trip generation data utilized in the EIR traffic impacts analysis is appropriate.	
<b>Comment L-2-23</b>	<b>Comments from City of San Diego, City Attorney (Marianne Greene),</b>	<b>Response</b>
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.	DEIR Table 3.14-40 shows that LOS F conditions are forecast at the College Avenue/Del Cerro Blvd intersection without project traffic, indicating poor operating conditions are expected with or without the project. The table also shows that implementation of the proposed mitigation measure for the	

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intersection (TCP-1) would decrease the intersection delay by an amount greater than the delay added by the project. Therefore, the proposed project is more than adequately mitigating for the impacts at the College Avenue/Del Cerro Blvd intersection.

Comment L-2-24	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
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.		As noted in the response to comment L2-20 above, the mitigation measure fair share contributions depicted in EIR Tables 3.14-36 and 3.14-37 were calculated according to the formula routinely used by the City in calculating fair-share contributions. Under CEQA, SDSU/CSU is not required to pay more than is necessary to mitigate the significant impacts of the proposed project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina, 39 Cal.4th at 361-362.)
Comment L-2-25	Comments from City of San Diego, City Attorney (Marianne Greene),	Response
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.		SDSU representatives have been meeting with City representatives, and Caltrans representatives, over the past several months to discuss the proposed project and to present the agencies with the EIR proposed mitigation measures.
Should you have any questions or need additional information, please contact me at (619) 446-5358 or Jim Lundquist at (619) 446-5361.		
Comment L-3-1	Comments from City of San Diego, Land Development Review Division (Robert J. Manis),	Response
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:		The description of the Adobe Falls Faculty/Staff Housing site provided in the Project Description is intended only to provide a broad overview of the existing site conditions. A detailed description of the existing Adobe Falls site and contiguous areas relative to each environmental impact category is provided in Draft EIR ("DEIR") Sections 3.1 through 3.14. Without further specificity in the comment, no additional responsive details can be provided.
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.		
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.		

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### Comment L-3-2

### Comments from City of San Diego, Land Development Review Division (Robert J. Manis),

### Response

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

The comment is noted. Visual character impacts relative to the Adobe Falls Faculty/Staff Housing project component are analyzed in DEIR section 3.1.6.1.1, pp. 3.1-39 to 3.1-47. The DEIR determined that the proposed project would result in potentially significant impacts to aesthetics and visual quality relative to the Adobe Falls development, and that the potentially significant impacts associated with the conversion of open space/natural habitat on the Adobe Falls site to residential housing would remain significant and unavoidable after implementation of the proposed mitigation measures. (DEIR p. 3.1-78.)

### Comment L-3-3

### Comments from City of San Diego, Land Development Review Division (Robert J. Manis),

### Response

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.

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.

As indicated in the Draft EIR (DEIR, p. 3.13-24), the Adobe Falls Faculty/Staff Housing project component would be provided potable water service through the existing 8 inch water line located in Adobe Falls Road. This facility has the capacity to serve the proposed units, therefore modifications to the existing line are not anticipated. Extension of a lateral line from this existing facility onto the SDSU site would be required. However, this utility line would be located beneath the proposed access road. Therefore, on the ground impacts of such lateral extensions would be contained within the area of impact shown on EIR Figures 3.3-2 and 3.3-3 (and analyzed for impacts to biological and cultural resources). Impacts to proposed future SDSU open space areas or the City's existing open space areas are not anticipated.

The Draft EIR describes a process for analyzing future impacts to existing sewer facilities (through a sewer study) (DEIR, p. 3.13-24). At this time, it is anticipated that sewer service could be provided through an extension from the main SDSU campus or tied into existing facilities within Adobe Falls Road. Similar to any potential water line extensions, any sewer laterals that are necessary would be contained within the development impact areas depicted on Figures 3.3-2 and 3.3-3 and have, therefore, been analyzed for biological and cultural resource impacts in the Draft EIR. Impacts to proposed future SDSU open space areas or the City's existing open space areas are not anticipated.

With respect to potential indirect impacts, several mitigation measures included in the Draft EIR address potential indirect impacts to sensitive habitat areas including existing City of San Diego mitigation sites. BR-5 (DEIR, p. 3.3-77) and BR-10 (DEIR, p. 3.3-78) would prevent proposed development landscaping from utilizing invasive or non-native species adjacent to native

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habitats. This will protect the mitigation site from invasive plant intrusion which can be a potentially negative influence and hinder growth of native plants that have been planted in this mitigation area. BR-7 (DEIR, p. 3.3-77) requires SDSU to prepare a Storm Water Pollution Prevention Plan to ensure that proper water quality measures are incorporated into project design. BR-8 (DEIR, p. 3.3-77 and 3.3-78) requires that an adequate buffer around sensitive habitats is retained within further site planning. This will help reduce domestic pet and human intrusion into the mitigation sites, which can often have detrimental impacts to a recovering site such as the mitigation area. Mitigation Measure BR-9 (DEIR, p. 3.3-78) requires that lighting be focused away from sensitive habitat areas, which will prevent disturbance to sensitive wildlife potentially utilizing the mitigation site. Mitigation Measures BR-11 and BR-12 (DEIR, p. 3.3-78 and 3.3-79, respectively) requires that SDSU take measures to discourage human and domestic pet intrusion into sensitive habitat areas. The incorporation of these measures would reduce potential impacts to sensitive biological resources associated with adjacent mitigation sites to a level below significance (DEIR, p. 3.3-79).

As to brush management, any required brush management shall occur entirely within the delineated project impact areas outlined on Figures 3.3-2 and 3.3-3. No brush management shall occur within the wetland buffer area or undeveloped upland areas. Please see Final EIR Mitigation Measure BR-17. Therefore, the City's open space area would not be impacted by brush management activity.

Regarding potential impacts from runoff, the hydrology and water quality analysis presented in Draft EIR Section 3.7 determined that development of the site would reduce on-site infiltration as a result of an increase in impervious surfaces in presently undeveloped areas that either drain to Alvarado Creek or naturally percolate into the soil. (DEIR p. 3.7-16.) DEIR Table 3.7-3, Peak Flow Summary, illustrates that, following project development, the peak flow rates of Alvarado Creek at the point where the creek leaves the Adobe Falls site would be increased by 2.5 cubic feet per second ("cfs") for an 85th percentile storm event (an 85th percentile storm event represents a "first flush" rain event), 4.38 cfs for a 2-year storm event, 7.13 cfs for a 10-year storm event, and 10.14 cfs for a 100-year storm event. (DEIR pp. 3.7-16 and 3.7-18.) The DEIR determined that the increase in runoff volumes for each storm event represented a potentially significant impact. (DEIR p. 3.7-16.)

Increased storm water flows and untreated runoff from the Adobe Falls site

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could potentially directly or indirectly impact existing biological resources on and adjacent to the project site. Additional storm water runoff quantity or velocity could result in increased erosion on the Adobe Falls site or immediately downstream of the site within the remaining naturalized portions of Alvarado Creek. Increased storm water runoff quantity or velocity may potentially result, during high flows, in loss of vegetative cover established along the naturalized portions of Alvarado Creek including the City of San Diego's Adobe Falls Supplemental Environmental Project area (located immediately north of the SDSU Adobe Falls Faculty/Staff Housing site). Additional storm water flows could potentially decrease water quality on or downstream of the project site. Water that contains oils, grease and other pollutants (which is often found in untreated run-off leaving developed areas) could negatively impact native plant establishment, aquatic wildlife health and/or reproductive cycles. These negative effects could in turn have indirect or direct effects on wildlife species higher on the local food chain.

In response to this potentially significant impact, the DEIR includes mitigation measure HWQ-2, which requires that prior to the preparation of final design plans for the Adobe Falls Faculty/Staff Housing Upper and Lower Villages, SDSU shall conduct a detailed site-specific hydrologic analysis to further assess the effects of the proposed project on the flood plain and downstream streambed capacities, based on the analysis results, on-site detention facilities may be required. (DEIR p. 3.7-29.) Should the projected flows result in an increase over the existing condition, onsite detention would be required. This would ensure that the same hydrology would be present post-construction as currently exists within the Alvarado Creek drainage system. Similarly, Mitigation Measure HWQ-1 and HWQ-11, (DEIR, p. 3.7-28-29, 3.7-32), outlines best management practices required to be incorporated into the final design plans. These measures would ensure that any run-off leaving development areas would be of similar or higher quality compared to water currently draining from the undeveloped SDSU property, into the Alvarado Creek aquatic system. In addition, Best Management Practices (BMPs) will be incorporated on the project site per the RWQCB 401 permit and the site specific storm water management plan that will ensure that wildlife and habitat downstream and/or adjacent to the project site are not directly or indirectly impacted by low water quality, erosion, sedimentation or other unanticipated effects associated with development of the project site.

As to the wetlands buffer, the proposed development footprint described and analyzed in the Draft EIR incorporates a wetland buffer ranging from 25 to 75 feet. In general, buffer widths were determined based on the type of wetland

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area that was in need of protection, as well as the topography present nearby these sensitive areas. In many cases, topographic differentiation established a logical beginning/ending point for a buffer. A minimum 25-foot buffer was established along the perennial tributary to Alvarado Creek that conveys storm water flows from a culvert outlet on the southwest corner of the Adobe Falls site to Alvarado Creek to the south. This stream channel is three feet wide on average, incised up to 10 feet and surrounded by relatively steep slopes along the east and west. Wetlands and upland habitat up to 200 feet wide will be preserved in place and enhanced on the west side of this stream channel. A 25 foot buffer was initially established along the east side of this channel to conform to the steep slope that parallels this drainage, and to provide an overall buffer ranging in width from 100 to 250 feet wide along the stream channel. A general 75 foot wide buffer was initially established along the south edge of the floodplain of Alvarado Creek to conform with the present topography and native vegetation adjacent to the floodplain and wetlands associated with the stream. This includes an area of buffer surrounding the cismontane alkali marsh on the SDSU Adobe Falls Lower Village site that extends over three hundred feet north of Alvarado Creek. The portions of the stream channel, floodplain marsh area and designated wetlands buffer that occur on the SDSU Adobe Falls Lower Village site also will be preserved. Finally, Mitigation Measure BR-8 (DEIR, p. 3.3-77 – 78), states that buffer areas shall be further developed during final design. BR-8 states that a 100-foot buffer shall be maintained along the floodplain of Alvarado Creek.

Comment L-3-4	Comments from City of San Diego, Land Development Review Division (Robert J. Manis),	Response
<p>Wetlands Restoration Plan:</p> <p>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.</p>	<p>While the specifics of wetland and upland restoration, creation and preservation have not been determined at this stage of the project, Figures 3.3-9 and 3.3-10 have been prepared to generally describe the areas that mitigation activity would take place both on and off site. Figures 3.3-9 and 3.3-10 note each restoration, creation and preservation area (both uplands and wetlands) proposed and outlined in Mitigation Measures BR-1 and BR-2 (DEIR, p. 3.3-75). The areas depicted on these maps are intended to support the wetland restoration program outlined in Mitigation Measures BR-1 and BR-2 (DEIR, p. 3.3-75) and Table 3.3-5, Proposed Mitigation – All Sites (DEIR, p. 3.3-74). Figures 3.3-9 and 3.3-10 will be included in the Final EIR.</p>	
Comment L-3-5	Comments from City of San Diego, Land Development Review Division (Robert J. Manis),	Response
<p>Public Utilities and Service Systems, Water Demand/Supply and Systems:</p> <p>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</p>	<p>The comment suggests that Senate Bill 610 ("SB610") "may" require SDSU to have a SB610 Water Supply Assessment ("WSA") prepared by the water supplier. CSU/SDSU/ disagrees with this comment.</p>	

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

SB610 took effect January 1, 2002. It has been codified in the Water Code beginning at §10910. The law requires the preparation of a WSA for certain projects within a city or county where that city or county has determined the project is subject to CEQA. See, Water Code §10910. In the setting where a city or county has determined that a project is subject to CEQA, the city or county must request, and the public water supplier must prepare, a WSA for any "project approval," which is subject to CEQA and which meets the definition of "project" in Water Code §10912 (i.e., a residential development project of more than 500 dwelling units or other types of specified development projects using a comparable amount of water). See also, Public Resources Code §21151.9.

In this case, CSU/SDSU made the determination that the proposed project was subject to CEQA, not the City of San Diego or the County of San Diego. As a result, the SB 610 WSA requirements do not apply because neither CSU nor SDSU is a city or county.

In addition, the law does not appear to be intended to apply to projects such as a long-term state university campus master plan revision, like the SDSU 2007 Campus Master Plan Revision project; the project definition provided in the law does not address educational facilities, nor does it address the academic year calendar, which results in less water demand than full calendar uses. Additionally, aside from the inapplicability of the law, the law also contains provisions suggesting that the County of San Diego, and the cities in the county, are deemed to have complied with the new law due to regional growth management programs and strategies. See, Water Code §10915.

Nevertheless, the Draft EIR, Section 3.13, assessed the proposed project's water demand, supply, and related systems and determined that the proposed project would not result in potential significant impacts to water supply. This is due, in part, to the fact that due to water conservation measures, SDSU's water consumption has remained relatively constant from 1989 to the present, despite increased campus population, the addition of approximately 2 million square feet of new buildings and structures, and improvements to campus landscaped areas. Consistent with CSU policy, SDSU will continue to implement conservation measures to reduce the use of water and decrease wastewater flows. See, DEIR pp. 3.13-3 to 4, and 3.13-20 to 24. In addition, the DEIR proposes mitigation measure PSS-1, which requires that SDSU consult with the City's Development Services Department, Water Review Section, on the sizing and extensions required for water and sewer lines that will serve each project component as it moves forward with site-specific



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design plans. (DEIR p. 3.13-35.) With implementation of the proposed mitigation, any potential impacts to water supply and demand would be reduced to a level below significant.

Comment L-3-6	Comments from City of San Diego, Land Development Review Division (Robert J. Manis),	Response
<p>MSCP —Betsy Miller (619- 533-4543)</p> <p>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.</p>		<p>Even though SDSU is not a "Permittee" or participating entity of the San Diego Multiple Species Conservation Program (MSCP), in an effort to ensure that the project is not impeding participating entities' (such as the City of San Diego) from implementing the Plan, all biological resource impacts and associated mitigation obligations would occur in compliance with the MSCP. SDSU plans to process a "take" permit for impacts to the federally-listed endangered coastal California gnatcatcher directly through coordination with the US Fish and Wildlife Service. Assuming the project will result in impacts to federally-protected wetlands and a permit from the US Army Corps of Engineers therefore will be necessary, SDSU will have a "federal nexus" and can process a take permit utilizing the guidelines in Section 7 of the federal Endangered Species Act. Although not likely given the existing project design information known to-date, should the project be able to avoid all impacts to federally-protected wetlands, thereby eliminating a federal agency nexus, SDSU may prepare their own Habitat Conservation Plan (pursuant to Section 10 of the Federal Endangered Species Act) which would outline the provisions for take, and associated mitigation, for the gnatcatcher. The above outlined process would not necessitate the use of the Third Party Beneficiary Status of the City's MSCP Subarea Plan. Therefore, SDSU will not be processing a City Site Development Permit.</p>
Comment L-3-7	Comments from City of San Diego, Land Development Review Division (Robert J. Manis),	Response
<p>Traffic Analysis, Jim Lundquist (619-446-5361)</p> <p>We have reviewed the Traffic Impact Analysis dated June 1, 2007 completed by Linscott, Law &amp; Greenspan Engineer and offer the following comments;</p> <p>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.</p>		<p>Please see response to San Diego City Attorney comment L2-6.</p>
Comment L-3-8	Comments from City of San Diego, Land Development Review Division (Robert J. Manis),	Response
<p>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</p>		<p>Please see response to San Diego City Attorney comment L2-7.</p>

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between the two segments of the project.

<b>Comment L-3-9</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
3. Section 3.5 discusses the residential roadway capacity of local streets. Adobe Palls 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.	Please see response to San Diego City Attorney comment L2-8.	
<b>Comment L-3-10</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.	Please see response to San Diego City Attorney comment L2-9.	
<b>Comment L-3-11</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
5. Section 5.3, Existing Ramp Meter Operations, must include an analysis of the observed meter rates and the observed queue lengths.	Please see response to San Diego City Attorney comment L2-10.	
<b>Comment L-3-12</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.'	Please see response to San Diego City Attorney comment L2-11.	
<b>Comment L-3-13</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.	Please see response to San Diego City Attorney comment L2-12.	
<b>Comment L-3-14</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.	Please see response to San Diego City Attorney comment L2-13.	

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<b>Comment L-3-15</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.	Please see response to San Diego City Attorney comment L2-14.	
<b>Comment L-3-16</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.	Please see response to San Diego City Attorney comment L2-15.	
<b>Comment L-3-17</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.	Please see response to San Diego City Attorney comment L2-16.	
<b>Comment L-3-18</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.	Please see response to San Diego City Attorney comment L2-17.	
<b>Comment L-3-19</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.	Please see response to San Diego City Attorney comment L2-18.	
<b>Comment L-3-20</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.	Please see response to San Diego City Attorney comment L2-19.	
<b>Comment L-3-21</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
15. Section 16.2 identifies a "fair share" contribution towards mitigation of	Please see response to San Diego City Attorney comment L2-20. Please also	

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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.

see General Response 3, City of Marina Compliance, for additional information responsive to this comment.

<b>Comment L-3-22</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.		Please see response to San Diego City Attorney comment L2-21.
<b>Comment L-3-23</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.		Please see response to San Diego City Attorney comment L2-22.
<b>Comment L-3-24</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.		Please see response to San Diego City Attorney comment L2-23.
<b>Comment L-3-25</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.		Please see response to San Diego City Attorney comment L2-24.
<b>Comment L-3-26</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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.		Please see response to San Diego City Attorney comment L2-25.
Should you have any questions or need additional information, please contact at Labib Qasem (619) 446-5358 or Jim Lundquist at (619) 446-5361.		
<b>Comment L-3-27</b>	<b>Comments from City of San Diego, Land Development Review Division (Robert J. Manis),</b>	<b>Response</b>
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		The Draft EIR addresses the projects potential impacts on solid waste disposal and recycling in EIR Section 3.13, Public Utilities and Services. The DEIR describes the existing conditions relative to solid waste disposal at pages 3.13-14 to 3.13-16, and the project's potential impacts at 3.13-31 to 3.13-32. Section 3.13 also addresses energy related matters, at pages 3.13-16 to 3.13-19, and the project's potential impacts at 3.13-33 to 3.13-35.

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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.

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.

Specific to solid waste and recycling, the DEIR notes that SDSU has developed a recycling campaign, which has resulted in an aggressive effort to educate the campus community about recycling post-consumer waste. SDSU also manages a recycling disposal and collection program on campus. (DEIR pp. 3.13-15 to 16.)

The DEIR determined that because the regional solid waste disposal landfills currently available are projected to reach capacity within the next several years, any increase in solid waste generation could be viewed as a potentially significant impact. Therefore, in order to reduce the proposed project's potential impacts relating to solid waste disposal, the Draft EIR proposes mitigation that would require SDSU: (i) to ensure that all demolition waste resulting from project construction is disposed of at an appropriate construction waste recycling facility; and (ii) to maintain an active recycling program in order to continue to meet the 50% diversion goal for all solid waste produced on campus. (DEIR p. 3.13-32; see mitigation measures PSS-7 and PSS-8, DEIR p. 3.13-36.) With implementation of the proposed mitigation, the project's potentially significant impacts would be reduced to a level below significant.

As to energy, the DEIR notes that the CSU Board of Trustees has approved key energy efficiency provisions and SDSU, in turn, has developed environmentally sustainable design goals and standards for the proposed project. These design goals and standards will be implemented by the CSU Office of the Chancellor and will be incorporated into the design of each project component. (DEIR pp. 3.13-34 to 35.) Additionally, SDSU already has engaged in an aggressive energy efficiency program throughout the campus which will further help reduce energy use in new buildings and facilities. These past and future energy conservation efforts by all SDSU programs and facilities will help offset future energy use and demand and, therefore, the proposed project will result in a less than significant impacts on energy resources. (DEIR p. 3.13-35.)

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Comment L-3-28	Comments from City of San Diego, Land Development Review Division (Robert J. Manis),	Response
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.	Written responses to each of the City's comments will be prepared and provided to the City at least ten (10) days in advance of the CSU Board of Trustees' consideration of the proposed project. (Pub. Resources Code §21092.5(a).)	
Comment L-4-1	Comments from City of San Diego, Planning and Community Investment Department,	Response
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:	As of the date of preparation of this response, SDSU staff has met with City staff to conduct the requested site visit.	
<p>General Comments:</p> <p>The City's Park Planning Section of City Planning &amp; 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.</p>		
Comment L-4-2	Comments from City of San Diego, Planning and Community Investment Department,	Response
<p>Specific Comments:</p> <p>Page 3.8-23 Table 3.8-2 College Area. Community Plan Consistency Analysis, Park and Recreation Goal</p> <p>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.</p>	<p>The comment is noted. However, for purposes of the consistency analysis provided in the Draft EIR at Table 3.8-2, the present availability of recreational facilities on the SDSU campus for use by current and future SDSU students is consistent with the City's broad goal and objective to provide a high level of recreational and social opportunities with the community.</p> <p>In any case, because SDSU is part of the California State University system, CSU/SDSU is exempt from local regulations, such as the City's General Plan, the College Area and Navajo Community Plan, and local zoning laws and regulations. The exemption is based on the doctrine of sovereign immunity. The immunity applies where, as here, the state (CSU/SDSU) is operating in a governmental capacity by utilizing its power and responsibility in connection with the construction and development of SDSU - a state university campus. See Education Code §66606.</p> <p>The only applicable land use plan for a CSU campus is the Campus Master Plan. The SDSU Campus Master Plan, which depicts campus boundaries, the physical facilities and the master plan student enrollment for the</p>	

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university. The proposed project seeks to revise the current SDSU Campus Master Plan to accomplish statewide objectives of maximizing the use of the existing facilities and academic resources, while providing for the orderly growth and expansion of the campus through establishment of long-range planning, which meets the needs of the university and maintains and enhances the quality of the academic environment. See, Education Code §89080. The specific objectives of the proposed project are consistent with these state wide objectives. See, DEIR, Section 1.4, Project Objectives.

Nevertheless, CSU considers local general plans, community plans, and zoning to be of interest to each CSU campus because each campus is situated within a local community. CSU traditionally attempts to work cooperatively with local communities, and to strive for consistency with local plans and policies, whenever feasible. Thus, SDSU has voluntarily reviewed municipal plans and policies for general consistency with the SDSU 2007 Campus Master Plan Revision project; however, none of these plans or policies govern, or have jurisdiction over, the CSU system, including SDSU.

<b>Comment L-4-3</b>	<b>Comments from City of San Diego, Planning and Community Investment Department,</b>	<b>Response</b>
Page 3.8-25, Table 3.8-3, Navajo Community Plan Consistency Analysis The 3 <sup>rd</sup> 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		The proposed Adobe Falls Faculty/Staff Housing Lower Village tentatively will include a swimming pool, a resident clubhouse/meeting space, and recreation areas. (Draft EIR p. 1.0-41.) Specific recreation features will be identified during project-specific development and review of the Lower Village. Please also see the response to comment L4-2 above.
<b>Comment L-4-4</b>	<b>Comments from City of San Diego, Planning and Community Investment Department,</b>	<b>Response</b>
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 community's needs for open space areas and active recreational facilities through existing joint-use agreements.		The comment is noted, and the requested revisions will be included as part of the Final EIR presented to the California State University Board of Trustees in connection with its consideration of the proposed project.
<b>Comment L-4-5</b>	<b>Comments from City of San Diego, Planning and Community Investment Department,</b>	<b>Response</b>
Page 3.13-7 Parks and Recreation, Revise the 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.		The comment is noted, and the requested revisions will be included as part of the Final EIR presented to the California State University Board of Trustees in connection with its consideration of the proposed project.
<b>Comment L-4-6</b>	<b>Comments from City of San Diego, Planning and Community Investment Department,</b>	<b>Response</b>

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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 n. 'pint use it should consist of at least 20 acres.

The comment is noted, and the requested revisions will be included as part of the Final EIR presented to the California State University Board of Trustees in connection with its consideration of the proposed project.

### Comment L-4-7

### Comments from City of San Diego, Planning and Community Investment Department,

### Response

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,...."

The comment is noted, and the requested revisions will be included as part of the Final EIR presented to the California State University Board of Trustees in connection with its consideration of the proposed project.

### Comment L-4-8

### Comments from City of San Diego, Planning and Community Investment Department,

### Response

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.

The comment is noted, and the requested revisions will be included as part of the Final EIR presented to the California State University Board of Trustees in connection with its consideration of the proposed project.

### Comment L-4-9

### Comments from City of San Diego, Planning and Community Investment Department,

### Response

Page 3.13-24 Parks and Recreation, 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 10.31 useable acres o f population-based parks. Thereby potentially increasing the demand for park and recreation facilities or services. The additional students . . .

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

Preliminarily, please see the response to comment L-4-2 above regarding the CSU/SDSU exemption from local regulations, such as the City's General Plan. Therefore, the General Plan standards do not apply to the proposed Campus Master Plan Revision project. In any event, the Draft EIR acknowledges that the Recreation Element of the 2006 City of San Diego General Plan Revision states that for every 1,000 residents, 2.8 acres of "population-based" park and recreation facilities shall be provided (DEIR, p. 3.13-8). The Table below provides a comparative analysis of the SDSU population increase from the 2006/2007 academic year to the 2024/2025 academic year. SDSU currently supports a campus population of 4,942. Assuming the City's 2.8 acre per 1,000 resident population standard, this total



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on-campus resident body would require a total of 13.8 acres of population-based park facilities. As of the 2006/2007 academic year, SDSU has 45.5 acres of on-campus recreation, park and open space facilities that meet the City's definition of population-based park and recreation facilities. Given the existing on campus resident population, SDSU currently exceeds the City's population-based park and recreation facility requirement by 31.7 acres.

### SDSU Population-Based Park Facilities Analysis

Time Period - 2006/2007 Academic Year  
Total Residents : 4942  
Total Park Acreage : 45.5  
Required per City Given Population : 13.8  
Amount Over/Under Requirement\* : 31.7

Time Period : 2024/2025 Academic Year  
Total Residents : 10653  
Total Park Acreage : 42.5  
Required per City Given Population : 29.8  
Amount Over/Under Requirement\* : 12.7

Difference:

Total Residents : 5711  
Total Park Acreage : -3.0  
Required per City Given Population : 16.0

The addition of 5,711 students and faculty/staff to the on campus residential community would equate to a total of 10,653 on-campus residents. The addition of 5,711 on campus residents (including Adobe Falls residents) would require a total of 29.8 acres of population-based park and recreation facilities. By 2024/2025, SDSU will have a total of 42.5 acres of on campus recreation, park and open space facilities that meet the City's current definition of population-based park and recreation facilities. Based on the 42.5 acres of facilities that will be on campus by 2024/2025, SDSU will exceed the City's population-based park and recreation facility requirement by 12.7 acres. Specific to Adobe Falls, while the use of Del Cerro park and recreation facilities may occur, it is reasonable to assume that future faculty and staff residents of the Adobe Falls Villages would utilize on-campus recreation resources, more than the average Del Cerro resident, due to their familiarity with and convenience of using on-campus facilities. In summary, under both

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existing and proposed project conditions, SDSU's existing and future park, recreation and open space facilities currently, and will continue to, provide more than adequate population-based facilities for the on-campus resident population.

Comment O-1-1	Comments from San Diego County Archaeological Society, Inc. (James W. Royle), 7/5/2007	Response
<p>I have reviewed the cultural resources aspect of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.</p> <p>Based on the information contained in the DEIR and its Appendix E, we have the following comments:</p> <p>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.</p>	<p>By letter dated July 12, 2007, SDSU responded to the Archaeological Society regarding the disclosure of archaeological site locations. Following investigation, SDSU determined that any inappropriate disclosures contained in Draft EIR Appendix E were the result of inadvertent error. In response to the error, SDSU obtained from its consultants a replacement version of Appendix E that is in full compliance with the disclosure restrictions. SDSU removed the original version of Appendix E posted on the SDSU website and replaced it with corrected Appendix E. SDSU also replaced the original Appendix E included in the three Draft EIR copies distributed to public libraries with corrected Appendix E. All copies of the Draft EIR distributed following receipt of the Archaeological Society letter contained corrected Appendix E. And, the Final EIR contains the corrected Appendix E. A copy of the July 12, 2007 letter from SDSU to the Archaeological Society is provided in Appendix E-1 of the Final EIR.</p>	
Comment O-1-2	Comments from San Diego County Archaeological Society, Inc. (James W. Royle), 7/5/2007	Response
<p>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.</p>	<p>As the comment requests, SDSU/CSU is working with the EIR's historical resources consultant to curate the small collection resulting from the testing conducted at sites SDI-18,326 and 18,327 at an institution meeting the standards of the State Historic Resource Commission's Guidelines for the Curation of Archaeological Collections, dated May 7, 1993.</p>	
Comment O-1-3	Comments from San Diego County Archaeological Society, Inc. (James W. Royle), 7/5/2007	Response
<p>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 designated as City of San Diego Historical Site Number 80,</p>	<p>As noted in the Draft EIR, "the Adobe Falls lie in an area that has been previously impacted by construction of two water pipelines from Lake Murray, a sewer pipeline, construction of Old Highway 80, the subsequent refinement of the old highway into Alvarado Freeway, and subsequent construction of I-8. Thus the falls have been impacted by modern disturbances associated with the construction of I-8, other construction projects, and graffiti." (DEIR p.</p>	

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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.

3.4-9.) The DEIR goes on to state that "implementation of the 2007 Campus Master Plan Revision would not directly impact the Adobe Falls because no development would occur in this area as the Adobe Falls site is located outside the project development area on property owned by the California Department of Transportation ["Caltrans"]." (DEIR p. 3.4-9.) The DEIR discusses that potential indirect impacts to the Falls, however, may result due to increased site visitation by residents of the proposed Adobe Falls housing development, but these impacts likely would not result in any further decrease in its historic significance. (DEIR p. 3.4-9.)

In direct response to the identified potential impacts, i.e., indirect impacts associated with increased site visitation, the Draft EIR includes mitigation measure CR-1, which provides for the installation of appropriate fencing and signage in order to minimize the identified potential indirect impacts. (DEIR p. 3.4-20.) Mitigation measure CR-1 directly addresses the potential impacts that would be caused by the project, and no additional mitigation is required. As documented in the DEIR, the existing impacted condition of the Adobe Falls site is the result of prior events and third party actions, and is not the result of the proposed project. Therefore, restoration of the site is not required under CEQA. This is consistent with DEIR Appendix E, which provides that the "preferred" mitigation (not mandatory) is to repair and maintain the landmark.

Notwithstanding, SDSU has consulted with the historical resources consultant and, based on those communications, the Final EIR will include an additional mitigation measure, Mitigation Measure CR-4, which will provide as follows:

CR-4□Prior to occupancy of the Adobe Falls Faculty/Staff Housing Lower Village, SDSU, or its designee, shall, in coordination with the California Department of Transportation, and following consultation with the San Diego Historical Site Resources Board, remove the existing graffiti, trash and debris from the Adobe Falls historic site in an effort to restore the site to its previously undisturbed condition, and shall also install signage identifying the historic significance of the Adobe Falls site.

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### Comment O-1-4

### Comments from San Diego County Archaeological Society, Inc. (James W. Royle), 7/5/2007

### Response

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

The comment is noted. As SDSU moves forward with project specific review for those components of the Campus Master Plan that were analyzed at the program level of review only, SDSU will reassess the historical significance of affected resources in light of the applicable threshold requirements.

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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.

Comment O-1-5	Comments from San Diego County Archaeological Society, Inc. (James W. Royle), 7/5/2007	Response
Thank you for including SDCAS in the public review period for this document.	San Diego State University and the Board of Trustees of the California State University acknowledge your input and comments. The comments will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
Comment O-2-1	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
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.	San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
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.	Under the California Supreme Court's ruling in City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341, SDSU/CSU's power to mitigate the effects of the project is ultimately subject to legislative control; if the Legislature does not appropriate the funds necessary to mitigate the significant impacts of the project to the jurisdictional agency, then CSU does not have the power to mitigate the project's effects. (39 Cal.4th at 367.) Therefore, as the Draft EIR notes in the Transportation/Circulation and Parking section, SDSU's fair-share funding commitment towards the identified roadway improvements is necessarily conditioned upon 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. (Draft EIR p. 3.14-117.) However, the law does not require that SDSU abandon the project, or parts of the project, in the event the Legislature denies funding of the identified roadway mitigation. Please also see General Response 3, City of Marina Compliance, for additional information regarding this subject.	
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.		
Comment O-2-2	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
Section 1.0 - Project Description	San Diego State University is a state university, funded by the State of California and charged with responding to student enrollment demand throughout the State of California. The same is true of all CSU universities.	
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?	As for how annual enrollment increases are determined, the overriding variable used to determine annual enrollment growth percentages is the ability	

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of each campus to enroll additional students in order to respond to statewide enrollment demand. Related to that consideration is the fact that there is an expectation that each campus take its fair share of additional students. Of course, there is also a fine tuning process in which adjustments are made to accommodate campuses that want to grow faster than the CSU systemwide average growth percentage rate, and similarly, adjustments made for campuses that have been losing enrollment over the past several years.

<b>Comment O-2-3</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
Comment 2: Update the demographic statistics using the recently released SANDAG population growth statistics for San Diego County.	The demographic statistics referenced in the Project Description relate to student enrollment planning projections and are based primarily on data provided by the state Department of Finance, the agency charged with making such projections. (See Draft EIR Section 1.3.2, Demographic Projections.) The most recent SANDAG population growth statistics for San Diego County are relevant to the EIR analysis of population and housing impacts provided in EIR Section 3.12. Section 3.12 utilizes SANDAG's most recent update of population projections, as contained in the 2030 Regional Growth Forecast (September 2006).	
<b>Comment O-2-4</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
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.	As noted in the response to comment O2-2 above, San Diego State University is a state university, funded by the State of California and charged with responding to student enrollment demand throughout the State of California.	
<b>Comment O-2-5</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
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 Centrepoint. 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.	<p>The following information is provided for each project listed in the comment:</p> <p>Mesa Commons I (confirmation of development plans) – As indicated in the Draft EIR, this project has been approved by the City of San Diego (DEIR, p. 2.0-3). At the time of Final EIR preparation, a developer was contemplating purchase of this entitled project with the intention of building the mixture of land uses per the existing entitlement (Reed, personal communication [via email], August 21, 2007).</p> <p>Mesa Commons II (confirmation of development plans) – As indicated in the Draft EIR, this project is being contemplated for approval by the City of San Diego (DEIR, p. 2.0-3). At the time of Final EIR preparation, a developer was contemplating purchase of this project with the intention of building the mixture of land uses previously contemplated by the existing project applicant</p>	

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(Reed, personal communication [via email], August 21, 2007).

Lindo Paseo Apartments (general information) – As indicated in Draft EIR Table 2.0-1, Cumulative Projects, this project is planned for location at the southeast corner of Lindo Paseo and 55th Street (DEIR, p. 2.0-4). The project location is identified as #10 on Draft EIR Figure 2.0-1 (DEIR, p. 2.0-7). This project is planned to consist of 126 beds. A formal application has not been submitted to the City of San Diego Redevelopment Agency. The above information was derived through a review of the September 7, 2004 College Community Redevelopment Project Area Third Five-Year Implementation Plan (2004-2009). It is anticipated that this project would move forward by build-out of the SDSU Campus Master Plan Revision. No further information regarding this project is available at this time.

Montezuma South (general information) - As indicated in Table 2.0-1, Cumulative Projects, this project is planned for location near the southeast corner of College Avenue and Montezuma Road (DEIR, p. 2.0-5). The project location is identified as #23 on Draft EIR Figure 2.0-1 (DEIR, p. 2.0-7). This project is planned to consist of 450 beds. A formal application has not been submitted to the City of San Diego. It is anticipated that this project would move forward by build-out of the SDSU Campus Master Plan Revision. No further information regarding this project is available at this time.

El Cerrito Gateway (general information) - As indicated in Table 2.0-1, Cumulative Projects, this project is planned for location at 5404 El Cajon Boulevard within the Crossroads Redevelopment Area (DEIR, p. 2.0-3). The project location is identified as #2 on Draft EIR Figure 2.0-1 (DEIR, p. 2.0-7). This project is planned to consist of a mixed-use development containing 220 multi-family dwelling units and 10,000 square feet of retail space. A preliminary review has been conducted thus far with the City of San Diego Redevelopment Agency; a formal application has not yet been submitted. The above information was derived through discussions with City staff during preparation of the Draft EIR. It is anticipated that this project would move forward by build-out of the SDSU Campus Master Plan Revision. No further information regarding this project is available at this time.

CentrepoinTE (proposed project changes) – As stated in the Draft EIR, this project is currently being processed through the City of San Diego Redevelopment Agency (DEIR, p. 2.0-3). At the time of Final EIR publication, the developer is currently under contract to sell the project to a national developer of student housing (Reed, personal communication [via email],

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August 21, 2007).

Sorority Row (status) – This project is currently on hold (Fulton, personal communication, August 20, 2007).

Aztec Inn (status) – This project will not go forward if the Campus Master Plan Revision is approved and the Alvarado Hotel project moves forward as intended and discussed in the Draft EIR (Fulton, personal communication, August 20, 2007).

Collwood Pines (plans for new student apartments) – During preparation of the Final EIR, the City of San Diego College Area Community Planner was contacted to determine the status of this project as it was not a known project at the time of Draft EIR preparation. A preliminary review of a 248 unit project has been submitted to the City. Based on preliminary discussions with the City, the applicant has indicated that they plan to gear the future units toward student housing, but restrictions to eliminate all other potential residents are not being contemplated by the City of applicant at this time. This project has yet to be submitted for formal development review with the City (Devine, personal communication [via email], August 23, 2007).

Comment O-2-6	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
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.	SDSU cannot speak on behalf of the Redevelopment Agency of the City of San Diego and, therefore, offers no comments with respect to the Redevelopment Agency's plans for the former Paseo site. With respect to SDSU's plans, as the Draft EIR notes in Table 2.0-1, the former Paseo project presently is "on-hold." SDSU presently is re-assessing the viability of the former Paseo project in light of changing circumstances, and it is uncertain what will result on this property. SDSU is still committed to the overall objectives of the Paseo, and would one day support a project on that site that incorporates student housing, retail and other amenities in an environment appropriate to a university setting. It is reasonable to expect that a Paseo-like project eventually will be developed on the site and, therefore, the Draft EIR includes the number of student housing beds that would have been developed under the Paseo project (1,300) in its long-term projections of available student housing beds. See Draft EIR Table 3.12-10.	
Comment O-2-7	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
Section 3.1 - Aesthetics and Visual Quality	Serious attempts have been made by campus planners in the last decade to unite the architectural vocabulary of the campus with that of the original campus quadrangle, which was designed in a traditional Spanish Mission	
Comment 6: Provide assurances that the architecture of the future buildings will		

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conform to the Spanish /Mediterranean heritage of the past.

Style. Campus planners recognize both the challenge and the benefits of representing the campus as an architecturally cohesive whole. Therefore, campus design guidelines are provided and will be adhered to that endeavor to provide aesthetically pleasing institutional buildings in the traditional San Diego State University style that will seek to unite each existing and future campus building into a unified whole.

Comment O-2-8	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
Section 3.8 - Land Use and Planning		
<p>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 nor have a reasonable expectation that sharing their streets with residents of a multi-family development was a possibility. The proposed housing is contrary to the area's single-family residential character.</p>		<p>The overall objective of the Navajo Community Plan Residential Element 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 density range." (DEIR Table 3.8-3.) The comment provides no evidence that the proposed Adobe Falls/Faculty Staff Housing project component would not maintain and enhance the quality of the existing residences in the area, or that it would conflict with the Residential Element's goals and objectives. Specific to multi-family housing, while it is correct that the Adobe Falls project component would be located adjacent to the single-family residences of the Del Cerro community, it is also true that the Adobe Falls project component would be located adjacent to the multi-family housing Smoke Tree development. Additionally, as stated in the Draft EIR, the proposed project would introduce a "variety of new housing types" with a low-medium density and, therefore, the project is consistent with the referenced goal.</p>
Comment O-2-9	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
<p>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.</p> <p>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.</p>		<p>The comment is incorrect. In determining whether a project would have significant land use and planning impacts under CEQA, the relevant inquiry is whether the project would conflict with any applicable land use plan, including general plan and zoning ordinances. (CEQA Guidelines Appx. G, IX. (b).) Because the City of San Diego general plan and zoning ordinances are not applicable to SDSU (because it is a state entity and not subject to local land use regulation), any conflicts with the City's general plan or zoning ordinances are not significant impacts within the meaning of CEQA. The Draft EIR complies fully with CEQA in that it discloses that the proposed project would conflict with various City land use plans; however, because these land use plans are not applicable to SDSU, these conflicts do not result in significant impacts within the meaning of CEQA. Because no significant impacts are identified, no mitigation and/or statement of overriding considerations is necessary.</p>
Comment O-2-10	Comments from College Area Community Council (Doug Case), 7/26/2007	Response



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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.

Please see response to comment O2-9 above.

Comment O-2-11	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
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.	Comment noted. The noise measurement conducted on Montezuma Road at Campanile Drive was intended for the purpose of calibrating the traffic noise model to accurately predict existing and future noise impacts from Montezuma Road upon the proposed Student Housing component. The noise measurement at Location 2 on Figure 3.10-2 (DEIR, p. 3.10-5) was taken to calibrate the noise model for the purpose of accurately predicting existing and future noise impacts from College Avenue upon the proposed Student Housing component. Neither of these noise measurements was used as the basis to evaluate the increase in noise levels from project-added trips to the vicinity roadways. Instead, a standard logarithmic equation developed by the acoustic industry for comparison of noise from different traffic levels was employed to determine the sound level increase associated with increased roadway traffic induced by the project. The logarithmic equation provides the relative increase (or decrease) of sound generated by one traffic level compared against the sound produced from another traffic level; the equation is independent of roadway or environmental conditions. In this regard, topographic and 'grade' considerations of the roadway are irrelevant; the existing noise level generated by traffic along Montezuma Road from 55th Avenue to Collwood Boulevard (including the effects of engine noise from hill ascent and descent) would be increased by less than 1 dB CNEL as a result of the increased traffic levels occurring on this roadway in the near term and with project-added traffic trips. Consequently, the analysis of noise level impacts from the project along the referenced segment of Montezuma Road in the Noise Technical Report is valid and accurate.	
Comment O-2-12	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
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."	The many services provided by SDSU's Office of Housing Administration and Residential Education Office (HA/RE) include assisting students with off-campus housing options. Resources include a web page designed to supply students with information about apartment hunting, the names of local communities, and discussions about how to choose a roommate or deciding on a budget. Although an electronic listing service for off-campus housing	

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was offered in the past, it was discontinued after determining it was infeasible to ensure nuisance rentals were not also included in the listings. Recognizing a need to enhance efforts to address off-campus housing issues, Student Affairs is in the process of hiring for a new position, an Off-Campus Housing Program Coordinator that will work to coordinate off-campus housing options.

Comment O-2-13	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
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 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.	<p>SDSU met with SANDAG during the summer of 2005 to discuss projected student enrollment increases at SDSU's main campus. SDSU was asked to forward current student projections to SANDAG; projections were forwarded to SANDAG on October 6, 2005 (see Appendix M to the DEIR, specifically Appendix A to the Population and Housing Technical Report). SANDAG released updated 2030 Growth Forecasts in September 2006. All projected growth figures outlined in the DEIR (i.e., Tables 3.12-1, 3.12-2, 3.12-3, 3.12-4 and 3.12-7), utilize the September 2006 SANDAG 2030 Growth Forecasts. Because SDSU submitted the 10,000 FTE (and associated faculty/staff) increase data to SANDAG prior to the September 2006 2030 Growth Forecast update effort, SDSU agrees with the commentor that the September 2006 2030 projections do incorporate the anticipated growth of the university.</p> <p>SANDAG's growth forecast methodology is multi-faceted given the variety of factors important to such projections (changes in death, birth and immigration rates as well as other non-demographic factors such as housing cost, employment increases, etc.). In the 2005 SDSU Campus Master Plan Revision EIR and associated technical studies, the June 2004 SANDAG 2030 Regional Growth Forecasts were utilized. The June 2004 growth forecasts did not include the projected SDSU increase of 10,000 FTE (and associated faculty and staff). As of June 2004, SANDAG had projected that from 2000 to 2030, a 65% population increase would occur in the College Area. In comparison, after the incorporation of SDSU's projected growth forecasts, as of September 2006, SANDAG projected that from 2004 to 2030, a 48% population increase would occur in the College Area. The following table provides a comparison of the June 2004 and September 2006 SANDAG growth forecasts for the City of San Diego and specifically the College Area Community.</p> <p>June 2004 and September 2006 SANDAG 2030 Growth Forecast Comparison</p> <p>June 2004 SANDAG 2030 Growth Forecast (Base Year = 2000) – Does not incorporate SDSU projected growth:</p>	

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### Locality - City of San Diego:

Base Population - 1,223,400  
 2010 Population Forecast – 1,370,3300  
 2020 Population Forecast – 1,507,80  
 2030 Population Forecast – 1,656,800  
 Total Increase – Base to 2030 – 433,400  
 Total % Increase – Base to 2030 – 37%

### Locality - College Area Community:

Base Population – 20,404  
 2010 Population Forecast – 24,203  
 2020 Population Forecast – 27,000  
 2030 Population Forecast – 33,597  
 Total Increase – Base to 2030 – 13,193  
 Total % Increase – Base to 2030 – 65%

The differences in base years aside, the September 2006 SANDAG projected increases in population in the College Area Community are lower for 2010 and 2030 compared to the June 2004 projections even though these projections included SDSU's projected forecasts. The table also shows that the 2020 projected increase in population was higher in the September 2006 growth forecasts compared to the June 2004 forecasts. Given that the overall growth anticipated in the College Area Community appears to be decreasing, it can be concluded that a 48% increase in population reported in the September 2006 2030 Growth Forecasts in the College Area is not entirely related to projected university growth.

Comment O-2-14	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
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.	As outlined in Draft EIR Table 3.12-5 (p. 3.12-10), as of 2004, 2,993 students (17%) lived on campus and 2,705 students (16%) lived in the College Area Community. These data do not differentiate between multi- or single-family dwelling units. Further, the population and housing analysis did not utilize more current student residence data because many students list their parent's address as their home address. When the EIR consultants reviewed this data during preparation of the 2007 EIR, the percentage of students with out-of-County addresses (i.e., parent's addresses rather than current, local addresses) gave the team reason to believe that SDSU's current address data was not a true reflection of current student residence patterns. For this reason, the population and housing analysis relied on the 2004 Brailsford and Dunlavey Study which is the most current study of student residential distribution.	

## Responses to Comments Report

### Comment O-2-15

### Comments from College Area Community Council (Doug Case), 7/26/2007

### Response

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.

Draft EIR Table 3.2-10 projects that 215 student housing beds associated with the Sorority Row project will be available sometime between now and the year 2011/12. Although the project is presently on hold, SDSU expects the project to move forward. Therefore, the Draft EIR correctly includes the 215 Sorority Row housing unit beds within its 2011/12 projected housing. As to the former Paseo project, the Draft EIR projects that 1,300 student housing beds associated with the former Paseo project will be available sometime after the academic year 2011/12, and before the 2024/25 academic year. (Draft EIR Table 3.12-10.) As discussed above in the response to comment O2-6, the former Paseo project presently is "on-hold" as SDSU is re-assessing its viability in light of changing circumstances. However, SDSU is still committed to the overall objectives of the Paseo, and expects that a Paseo-like project eventually will be developed on the site. Therefore, in projecting future student housing bed availability, the Draft EIR includes the number of student housing beds that would have been developed under the Paseo project (1,300) in its long-term projections of available student housing beds. See Draft EIR Table 3.12-10.

### Comment O-2-16

### Comments from College Area Community Council (Doug Case), 7/26/2007

### Response

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.

There are many factors that contribute to SDSU student housing choices. As the commentor suggests, housing cost has been, and will continue to be, an important factor for existing and future students. The solution to the rise of nuisance rentals ("mini-dorms") in the College Area Community is multi-faceted. Development of additional multi-family housing units in the College Area Community and along transit routes will help provide additional options for students and, through the effects of a free market economy, may help increase competition and therefore reduce the price of available units. The City of San Diego, through local land use and zoning controls, has helped curb the flow of students utilizing single family homes as mini-dorms. In July 2007, the City of San Diego City Council voted in favor to amend the Land Development Code to restrict the number of bedrooms in single family residential neighborhoods, limit the width of driveways and clarify the requirements for garage conversions (City of San Diego, City Council Meeting Minutes, July 9, 2007). Further, a proposed "rooming house" ordinance is planned for hearing by the City Council in the Fall of 2007. This ordinance would restrict commercial lease activity of single family homes to multiple lease-holders in specific single family residential neighborhoods of the City. The City of San Diego Police Department has and continues to be instrumental in reducing the negative impacts of mini-dorms. A six-month

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pilot program instituted by the City of San Diego Police Department and City's Neighborhood Code Compliance Division has resulted in issuance of 30 \$1,000 citations as of early August 2007 (San Diego Union Tribune, August 5, 2007). Further, the City Council and San Diego Police Department continue to and have increased support/enforcement of the Community Assisted Party Program (CAPP) which provides a mechanism to combat chronic party houses (City of San Diego, City Council Meeting Minutes, July 9, 2007). SDSU-sponsored on-campus housing development will assist in providing students with close and convenient living choices. All of the above efforts constitute important components of the multi-faceted issue of mini-dorms. Because it is likely that these efforts will help curb the amount of, and negative community effects of mini-dorms, it can not be assumed that a single factor, the increase of SDSU students, has a direct correlation with an increase in mini-dorms within the College Area Community. Please also see General Response 2, Population and Housing Related Matters, for additional information responsive to this comment.

<b>Comment O-2-17</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
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.	The referenced student housing financing feasibility report is still being prepared and is not yet complete. A substantial amount of work remains to be done on the report, and SDSU anticipates that it will be completed sometime around the end of the year. SDSU has discussed preliminary information regarding the report with the report's authors, and the report contains no significant new information that would alter the conclusions reached in the Draft EIR. It is not necessary to extend the Draft EIR comment period.	
<b>Comment O-2-18</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
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.	<p>The comment is noted. The reference to the City of San Diego Municipal Code Section 59.5.0502 on page 3.12-21 of the Draft EIR will be revised as follows:</p> <ul style="list-style-type: none"> <li>•□If music or crowds are sound production or reproduction is clearly audible 50 feet from a sensitive receptor's property line between the hours of 10:00 pm and 8:00 am, a citation may be issued.</li> </ul> <p>Issues addressed – Noise Enforcement Entity – SDSU police; City police</p> <p>The Final EIR will contain the revised text.</p>	
<b>Comment O-2-19</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>

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

The comment is noted. Draft EIR Section 3.12.5.2.1.1 will be revised to include a reference to the City of San Diego "rooming house ordinance" that is to be considered at an upcoming City Council meeting. The ordinance, if adopted, is intended to clarify the number of unrelated individuals who can live in one single family residence. The following "rooming house ordinance" text will be added to the EIR at page 3.12-22:

•□The City of San Diego is contemplating a "rooming house" ordinance would restrict commercial lease activity of single family homes to multiple lease-holders in specific single family residential neighborhoods of the City. This ordinance is planned for consideration at an upcoming City of San Diego City Council meeting.

Issues addressed – Large numbers of unrelated individuals living in single family homes within single family neighborhoods.

Enforcement Entity – City administration

The Final EIR will include the additional text.

Comment O-2-20	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
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.	Draft EIR section 3.14.10 presents the results of a detailed parking analysis conducted by the traffic engineers. The analysis determined that based on the number of existing and planned parking spaces on campus, there will be a total of 15,591 parking spaces by project buildout year. This amount represents 3,488 parking spaces more than the calculated demand of 12,103 parking spaces. One of the reasons for the project excess capacity is the increasing trolley ridership and related reduction in vehicle trips. Therefore, there will be sufficient parking capacity available to accommodate the additional residence halls to be developed on the southeast corner of campus, and no significant impacts on parking and traffic circulation would occur in the surrounding neighborhoods and other areas of the campus.	
Comment O-2-21	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
Comment 20: Consider as a parking and traffic mitigation measure prohibiting freshmen living on-campus from having cars, as many institutions currently do.	The CSU's commitment to serving the local service area means many of our students are San Diego locals who reside at home and drive to school. Private universities have far more flexibility than public universities such as SDSU in the ability to impose campus restrictions such as prohibiting freshman from bringing in cars. Even if such a policy could be directed solely at students residing on campus, undue hardships would be placed on those whose places of employment are off campus. In addition, these types of restrictions could have the unintended effect of pushing first year students into off-campus housing so they could have a car, thereby negatively impacting	

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the local community by pushing parking demand outside of campus and onto local streets. One of the most important goals of the master plan is to make SDSU a more residential campus; thus, it is critical that SDSU seek opportunities to encourage students to select on-campus housing rather than penalize them for doing so.

<b>Comment O-2-22</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
Comment 21: As a mitigation measure, consider providing for free trolley and bus passes to all students as other institutions in California do.	SDSU currently subsidizes the cost of student transit passes and will continue to do so. Since the completion of the SDSU LRT station and bus platform, SDSU has cooperatively worked with MTS to encourage ridership and the use of public transit. During the first year of LRT operations, SDSU and MTS initiated a subsidized "College Pass" which is sold during the first month of the semester. SDSU pays a \$20.00 subsidy to each rider making the price of a transit pass approximately \$113/semester. This is 15% of the cost of a normal transit pass. Over 3,000 passes were sold during the first Fall semester of operations. During the second year of operations, 2006, ridership increased to over 4,500 students and the subsidy continues to encourage students to utilize transit.	
<b>Comment O-2-23</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
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.	The comment appears to be based on the assumption that there is insufficient parking available on campus and, therefore, commuting students would benefit by parking off-site at park and ride locations and then ride the trolley the short distance to campus. However, as discussed above in the response to comment O2-20, the traffic impacts analysis determined that at buildout of the full project there will be a substantial surplus of parking spaces available on campus for student parking.	
<b>Comment O-2-24</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
Comment 23: Clarify plans for a shuttle service to bring students parking in outer parking lots/structures to the center of campus.	In 2000, SDSU implemented the Red-Black Shuttle bus service to transport students from remote parking lots to the core of the campus and to provide for bus service throughout campus property. This system was necessitated by the activities underway with the construction of LRT station and the lack of campus parking. During the period 2000/01 SDSU constructed Parking Structure 5 and followed that with construction of Parking Structure 6 in 2003/04. These structures combined added over 3,000 parking spaces to the campus inventory. During the construction of the LRT station approximately 3,000 cars were temporarily out of service thus, the net new parking space were not realized until 2005 at the completion of the LRT construction. The campus continued to operate the Red Black Shuttle bus throughout the	

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2005/06 FY and ultimately discontinued service when ridership faded due to the increase of public transit usage and the availability of convenient parking. At the end of service the Red Black Shuttle bus was costing SDSU approximately \$11.00/rider/trip. As of this date a shuttle bus system is not necessary, however if in the future as the campus expands a shuttle bus system is warranted, SDSU will consider re-instituting the Red Black shuttle to meet transportation demand.

In addition SDSU currently maintains a bus escort service for after hours pick-up and security, and there are campus shuttle buses which transport students, faculty and staff to Alvarado Park. As physical expansion of Alvarado Park occurs, consideration will be given to an internal campus shuttle bus system and other improvements as part of an overall transportation demand management program.

### Comment O-2-25

### Comments from College Area Community Council (Doug Case), 7/26/2007

### Response

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.

The September 2006 and February 2007 traffic counts were taken between 7:00 and 9:00 a.m., and, between 4:00 and 6:00 p.m. These hours are the standard peak hours for traffic analysis purposes. Pedestrian counts also were conducted at each intersection, and this activity is accounted for within the Montezuma Road/College Avenue intersection impacts analysis.

### Comment O-2-26

### Comments from College Area Community Council (Doug Case), 7/26/2007

### Response

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. / 1-8 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.

Preliminarily, as noted in the EIR, the four referenced roadway segments/intersections are significant and unavoidable because no feasible mitigation has been identified that if implemented would reduce the identified significant impacts to a level below significant. As to the project's fair-share contribution towards feasible mitigation, under the California Supreme Court's ruling in *City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal.4th 341, SDSU/CSU's power to mitigate the effects of the project is ultimately subject to legislative control; if the Legislature does not appropriate the funds necessary to mitigate the significant impacts of the project to the jurisdictional public agency, then CSU does not have the power to mitigate the project's effects. (39 Cal.4th at 367.) Therefore, as the Draft EIR notes in the Transportation/Circulation and Parking section, SDSU's fair-



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share funding commitment towards the identified roadway improvements is necessarily conditioned upon 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. (Draft EIR p. 3.14-117.) However, the law does not require that SDSU abandon the project, or parts of the project, in the event the Legislature denies funding of the identified roadway mitigation. Please also see General Response 3, City of Marina Compliance, for additional information responsive to this comment.

The comment that development of the proposed project should not proceed without appropriate funding to mitigate the traffic impacts of the project will be included as part of the record and made available to SDSU and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. Please see the first comment and response of this letter, comment number O2-1.

Comment O-2-27	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
<p>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.</p>	<p>The University has in place a comprehensive traffic and management plan for the campus, including focused efforts during the first few weeks of the fall semester to address traffic/pedestrian circulation issues. As SDSU transitions from a 'commuter' to a 'community' campus, students are now able to use the MTS green line facility as an alternative to driving, travel between campus and nearby cultural activities, and be part of a new 'green-friendly' campus environment. In conjunction with the Metropolitan Transit District, the University has bolstered efforts to increase transit usage by providing subsidized transit passes for students and reduced rate monthly passes for faculty and staff.</p> <p>The programs promoted and information provided on the University's Parking and Transportation website include:</p> <ul style="list-style-type: none"> <li>• <input type="checkbox"/> Bus and trolley information with links to schedules;</li> <li>• <input type="checkbox"/> Tips on using alternative traffic routes and parking in areas of campus that are less congested;</li> <li>• <input type="checkbox"/> SDSU's "School Pool", a rideshare program which is free to all students, faculty and staff. Those interested, whether they drive or not, can apply online at <a href="http://www.ridelink.com">www.ridelink.com</a> and are paired with other SDSU commuters who live nearby;</li> <li>• <input type="checkbox"/> "Park and Pedal" information on nearby areas from which students, staff, and faculty can easily ride to campus; and,</li> <li>• <input type="checkbox"/> Additional information on the campus' Red and Black shuttle, Campus</li> </ul>	

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Escort Services, and location of resources such as the parking information booth.

As future facilities are designed and constructed in accordance with the CSU's new policy on Sustainable Building Practices, the campus will endeavor to improve bicycle transportation on campus, continue to develop programs encouraging alternative modes of transportation, and will work with the City to coordinate our efforts to reduce traffic and facilitate bicycling, carpooling, and public transit.

<b>Comment O-2-28</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
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.	The mitigation measures proposed in the Draft EIR to mitigate the identified impacts to Alvarado Road and the referenced intersections are provided in DEIR Section 3.14.13, as revised in the Final EIR. The mitigation measures, and the respective intersection/roadway segment addressed by the measure, are: TCP-2 [College Avenue/I-8 EB ramps]; TCP-3 [College Avenue/Canyon Crest]; TCP-7 [Alvarado Road, E. Campus Drive to Reservoir Drive]; TCP-8 [Alvarado Road, Reservoir Drive to 70th Street]; TCP-14 [College Avenue/I-8 WB ramps]; TCP-15 [College Avenue/Canyon Crest]; TCP-17 [Alvarado Road/Alvarado Court]; TCP-18 [Reservoir Drive/Alvarado Road]; TCP-20 [Alvarado Road/70th Street]; and TCP-21 [I-8 eastbound ramps/Alvarado Road].	
<b>Comment O-2-29</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
Comment 28: Consider utilizing part of Parking Lot C to realign Alvarado Road near College Ave. and/or to redirect bike paths.	The comment is noted. All options relative to the realignment of Alvarado Road will be considered by the university, in conjunction with the City of San Diego, including utilizing part of Parking Lot C to realign the road near College Avenue, and/or to redirect bike paths.	
<b>Comment O-2-30</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
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.	It is not certain that the removal of on-street parking would be necessary to widen Alvarado Road. Mitigation measures TCP-7 and TCP-8, which provide mitigation for the project's contribution to the forecast conditions on Alvarado Road, require that subject to funding by the state Legislature, SDSU contribute to the City of San Diego its fair-share of the costs to widen Alvarado Road, from E. Campus Drive to Reservoir Drive to 70th Street. Under the law, SDSU/CSU is not required to pay more than is necessary to mitigate the significant impacts of the proposed project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina, 39 Cal.4th at 361-362.) The mitigation measures contemplate only	

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that Alvarado Road will be widened, and they do not require necessarily the removal of on-street parking.

<b>Comment O-2-31</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
Comment 30: The Draft EIR fails to address traffic increases (volume) on main feeder sheets within the College Area (i.e. Saranac Street, Mohawk Street and El Cajon Blvd.).	The San Diego Traffic Engineers' Council ("SANTEC") Guidelines for conducting traffic studies in the San Diego Region provides a 50 peak hour trip threshold for the analysis of roadways, that is a street need not be analyzed if the proposed project would add less than 50 peak hour trips to the roadway. In this case, the proposed project is forecasted to add less than 50 peak hour trips to Saranac Street, Mohawk Street and El Cajon Blvd. Therefore, including the subject streets in the traffic impacts analysis was not warranted.	
<b>Comment O-2-32</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
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 of the expense. The Fair Share Percentages only range from 1% to 39%, with only 5 of the 33 mitigation measures exceeding 20%.	Under CEQA, SDSU/CSU is not required to pay more than is necessary to mitigate the identified significant impacts of the proposed 2007 Campus Master Plan Revision project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341, 361-362.) The Draft EIR calculated the SDSU/CSU fair-share percentages according to the formula used by the City of San Diego. The formula, and resulting calculations, are shown at Draft EIR pp. 3.14-108 - 110.	
<b>Comment O-2-33</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
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.	As the SDSU campus rapidly approaches enrollment capacity, on-going efforts have been and will continue to be undertaken to review and evaluate the use of off-campus centers. However, there are numerous factors to consider in determining the adoption of an alternative sites model. SDSU Academic policy states that Off-Campus Centers should be guided by specific academic principles. Of overriding importance is the requirement that all academic programs should be as comparable as possible with programs on the main campus, remaining in conformity with the University's overall mission and rigorously adhering to the long-standing teacher-scholar model that distinguishes SDSU. The following mission statement provides a broad framework for determining the viability of off-campus sites:  "The general goals of any San Diego State University off-campus site should be consistent with the University's educational mission. Any such site should complement or add value to the University's programs. Baccalaureate, graduate, post-baccalaureate, certificate, and/or continuing education	

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programs located in these sites should reflect the high academic expectations of the institution and provide access to higher education for diverse communities.

An off-campus site should develop educational goals and academic programs specific to the needs of the region and, where appropriate, local communities. A site should provide the intellectual and physical environment to maximize educational opportunities, consistent with individual and community interests and needs. Collaboration with other higher education institutions, governmental entities, and interested businesses/industries should be considered. In addition to traditional core academic programs, an off-campus site may provide education through field placement, clinical experience, and/or faculty/student research opportunities, using a broad spectrum of learning modalities."

As in the past, when opportunity is presented and/or when enrollment demand demonstrates the need to provide off-site instruction and remote facilities, SDSU will make every effort to respond to the call.

Comment O-2-34	Comments from College Area Community Council (Doug Case), 7/26/2007	Response
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.	Draft EIR Section 5.5 analyzes five off-campus sites in the immediate vicinity of the university for potential acquisition and development as classroom/research facilities and/or student housing. The comment does not specify why the analysis is viewed as inadequate and, therefore, no specific response can be provided. However, the commentator should note that Draft EIR Section 5.2.2 (pages 5.0-3 - 4) also addresses the subject of off-campus alternative locations. As explained in Section 5.2.2, "[b]ecause 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 for the development of academic facilities to accommodate the increase in FTES would not meet one of the primary objectives of the project. Additionally, as discussed in [Draft EIR] Section 5.4 below, Institutional Alternatives, SDSU has in the past, and continues to, explore the establishment of off-campus centers in both the South Bay and East County San Diego regions. Included within this effort, SDSU has been in intermittent talks with Chula Vista officials about developing a satellite campus in that city for many years. However, as discussed further in Section 5.4, it is not presently feasible from a student demand perspective and, consequently, cost perspective, to develop a South Bay alternative. Furthermore, also as discussed in Section 5.4, aside from the feasibility of establishing another university in the greater San Diego region, relocation of the proposed	

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academic facilities to another area merely would have the effect of shifting the traffic and air quality impacts to another location, rather than avoiding or lessening the significant impacts of the proposed project." Section 5.2.2 also addresses the Qualcomm Stadium site, and alternative locations for the Adobe Falls Faculty/Staff Housing project component.

<b>Comment O-2-35</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
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.	The comment expresses the opinions of the commentator and does not raise an environmental issues within the meaning of CEQA. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.	
<b>Comment O-2-36</b>	<b>Comments from College Area Community Council (Doug Case), 7/26/2007</b>	<b>Response</b>
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.	Please see response to comment O2-4, above. San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
<b>Comment O-3-1</b>	<b>Comments from Smoke Tree Adobe Falls Owners Association (Carolyn Colmie), 7/13/2007</b>	<b>Response</b>
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.	This comment expresses an opinion and does not raise any specific issues as to the adequacy of the Draft EIR; therefore, no more specific response can be provided or is required. However, the commentator should note that a large portion of the proposed site for the Adobe Falls Faculty/Staff Housing will remain open space. Additionally, the Adobe Falls historical site, which is owned by the California Department of Transportation and not SDSU/CSU, will remain undeveloped. Furthermore, SDSU will undertake efforts to restore the Adobe Falls site to its natural condition. (See Final EIR Mitigation Measure CR-4.)	
<b>Comment O-3-2</b>	<b>Comments from Smoke Tree Adobe Falls Owners Association (Carolyn Colmie), 7/13/2007</b>	<b>Response</b>
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.	CSU/SDSU acknowledges the commentator's opposition to the proposed project, specifically the Adobe Falls Faculty/ Staff Housing's use of alternate access through the Smoke Tree Condominium Residences. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	

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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.

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.

However, the commentator should note that the Smoke Tree access route for the Lower Village component of the Adobe Falls Faculty/Staff Housing was analyzed at the program level and as an alternate access route. (DEIR pp. 5.0-33 to 5.0-49.) The fact that the Draft EIR analyzed this alternate route at the program level means that additional environmental review and approval will be required before the Lower Village will be built out and/or access is secured through use of the Smoke Tree community's roads. Upon undertaking this additional environmental review, the roadway capacity of Smoke Tree's roads, the western portion of Adobe Falls Road, and Waring Road will be further evaluated and the proposed project's impacts further assessed. In addition, this future project-level review would contemplate safety risks to residents of Smoke Tree, emergency vehicle access, and other potential environmental impacts affiliated with buildout of the Lower Village component of the Adobe Falls Faculty/Staff Housing.

Comment O-3-3	Comments from Smoke Tree Adobe Falls Owners Association (Carolyn Colmie), 7/13/2007	Response
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.	As set forth in the project description, the Adobe Falls Faculty/Staff Housing is designed for the exclusive use of faculty and staff. (DEIR pp. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.) Further, as required by CEQA, the environmental analysis set forth in the Draft EIR is premised on this very project description. Any amendment to this description (e.g., converting faculty/staff housing to university student housing) that would alter the environmental impact analysis may warrant further environmental review. Therefore, the Draft EIR itself already provides assurances that the Adobe Falls Faculty/Staff Housing will be used only by faculty and staff.	

Comment O-4-1	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
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	This comment is an introduction to comments that follow. No further response is required.	

## Responses to Comments Report

Master Plan.

### Comment O-4-2

### Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007

### Response

#### 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: [Table not included]

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 to the existing 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.

As noted in Draft EIR Section 3.14.6, Thresholds of Significance, CEQA Guidelines Appendix G, subdivision XV a), provides that a project may have a potentially significant impact on transportation and circulation if the project would "cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?" Based on Appendix G, a significant impact would result if the project traffic would substantially increase traffic relative to the existing traffic load and the capacity of the street system; the existing traffic load is not to be considered without also considering the capacity of the street as consideration of both factors is necessary to determine whether the additional project traffic would exceed the available capacity resulting in deficient operating conditions.

As discussed in DEIR section 3.14.8.2.2, with the addition of project traffic, all of the roadway segments in the Del Cerro community would operate within the acceptable capacity limits, and within the City's assigned acceptable levels of service. (DEIR p. 3.14-69.) Therefore, even if the project would substantially increase traffic relative to the existing traffic load, the roadways have sufficient available capacity to accommodate the increased traffic and the project would not result in a significant impact within the meaning of CEQA.

This determination is consistent with the City of San Diego's Significance Determinations Threshold report dated January 2007, which utilizes thresholds where there is no limit to the % increase a project can cause without having a significant impact, provided the post-project traffic remains within the LOS D capacity of the roadway (i.e., acceptable conditions), as is the case here. A copy of the City's Significance Determinations Threshold report dated January 2007 is included in Final EIR, Appendix N-1.

It is also noted that based on a survey of the 19 jurisdictions located within the County of San Diego conducted by Linscott, Law & Greenspan, LLG, traffic engineers, none of the jurisdictions within the County utilize a "percent increase" threshold to determine traffic impact significance for those instances in which the post-project traffic is within the roadway's design capacity.

Because the proposed project would not result in significant traffic impacts to the Del Cerro roadways, mitigation is not necessary, and the project will not

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result in significant, unmitigated impacts, as the comment incorrectly contends.

Comment O-4-3	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
<p>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 units X 8 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.</p>	<p>With respect to the comment regarding DEIR page 3.14-37 (Table 3.14-15A) and the number of vehicle trips generated by the Lower Village, the total number of average daily trips ("ADT") was rounded from 992 (124 units x 8 ADT) to the nearest 10 digit. Hence, the 990 figure in DEIR Table 3.14-15A.</p> <p>Figure 8-4 contains a typographical error regarding the project generated ADT on Adobe Falls Road/Mill Peak Road. The increased traffic load on Adobe Falls Road attributable to the Lower Village development is 990 ADT, not 1040 as shown, and the increased traffic load on Mill Peak Road attributable to the Upper Village development is 380 ADT, not 340 as shown. (See DEIR Table 3.14-15A, Horizon Year Project Trip Generation, Upper Village and Lower Village volumes.) All other numbers depicted on Figure 8-4 are correct; the typographical errors do not affect the traffic distribution percentages shown, nor the ultimate analysis. The Final EIR will include a corrected Figure 8-4.</p>	
Comment O-4-4	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
<p>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.</p>	<p>The comment is correct, Table 3.14-27A contains a typographical error. The Horizon Year with Project volumes for Adobe Falls Road/Mill Peak Road north of Genoa Drive should read 1400, not 840. The 1400 figure is based on combining the existing ADT (410) with the Lower Village ADT of 990. (See, Table 3.14-15A, Horizon Year Project Trip Generation.) The error does not affect the impact determination; the "with Project" 1400 ADT is within the 1500 ADT capacity of Adobe Falls Road. Accordingly, no significant impacts would result at this location. The Final EIR will include a corrected Table 3.14-27A and Table 3.14-23, which contains the same error.</p>	
Comment O-4-5	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
<p>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, is, 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 problems with that intersection by raking 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</p>	<p>To mitigate the proposed project's impacts at the College Avenue/Del Cerro Boulevard intersection, the EIR includes mitigation measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the costs to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-102.) The EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (See DEIR p. 3.14-114.) Under CEQA, SDSU/CSU is not required to pay more than is</p>	



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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 his 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."

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%.

necessary to mitigate the significant impacts of the proposed project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina, 39 Cal.4th at 361-362.) As the comment notes, SDSU's fair-share contribution to the improvement is 5%, which was calculated according to the formula routinely used by the City of San Diego. (DEIR pp. 3.14-108 to 109.)

With respect to the comment regarding physical limitations to implement the necessary improvements, field observations indicate that there is 65 feet of curb-to-curb pavement on the east leg of Del Cerro Boulevard. This is sufficient width to provide the recommended additional third westbound lane and still provide two eastbound lanes, since the typical lane width is 12 feet.

Comment O-4-6	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
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.	<p>Under the "No Adobe Falls Alternative" or "50% Adobe Falls Alternative," significant impacts to the roadways beyond the Del Cerro residential community would not be avoided and, therefore, under these alternative scenarios, the project would result in significant impacts, some of which would remain significant and unavoidable after mitigation.</p> <p>The comment is correct that under these alternatives "impacts" to Del Cerro's residential streets would be avoided or reduced. However, since these "impacts" are not considered significant in the first instance, the alternatives would not avoid a significant impact, which is the relevant inquiry under an alternatives analysis. (DEIR p. 5.0-22; see CEQA Guidelines §15126.6(a), alternatives should "avoid or substantially lessen any of the significant effects of the project.")</p> <p>With respect to the Del Cerro Boulevard/College Avenue intersection, under either the "No Adobe Falls Alternative" or the "50% Adobe Falls Alternative," the impact at the intersection would remain significant as a result of the</p>	

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additional traffic attributable to the increased student population, and the increased traffic resulting from the Alvarado Hotel, even without development of the Adobe Falls site. However, as the EIR points out, under either alternative the impact could be reduced to a level below significant with mitigation. (DEIR p. 5.0-22.)

In sum, the DEIR correctly reports at p. 5.0-16 that "potentially significant impacts to transportation/circulation would not be eliminated or reduced under [the No Adobe Falls Alternative] and, therefore, impacts relating to increased vehicle traffic would remain significant and unavoidable."

Comment O-4-7	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
<p>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 [text missing] 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 heavily in favor of a "Low Volume Residential Local Street" classification, with a maximum capacity of 700 ADT.</p> <p>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.</p>	<p>The classification of the Del Cerro roadways in the traffic impact analysis as "residential local streets" with a maximum capacity of 1500 ADT, rather than as "low volume residential local streets" with a capacity of 700 ADT, is based on an assessment of actual on-site roadway conditions, and is consistent with the City of San Diego Street Design Manual, the Traffic Impact Study Manual, and the Navajo Community Plan. As explained in General Response 1, Del Cerro Roadway Classifications, the City of San Diego Street Design Manual requires the consideration of a number of on-site roadway factors in determining the proper classification of a roadway, factors including the width of the roadway, the width of the right-of-way, the maximum grade, the minimum curve radius, and the adjacent land uses; the consideration of existing traffic volumes is not relevant to this determination because roadway classifications are based on a roadway's physical characteristics, and not its existing volumes. Please see General Response 1, Del Cerro Roadway Classifications, for additional information responsive to this comment.</p> <p>With respect to the comment regarding the CEQA Guidelines, please see the response to comment O4-2.</p>	

Comment O-4-8	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
<p>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.</p>	<p>Preliminarily, restoration of the Adobe Falls, and the development of any trails on the Adobe Falls site, would not occur until development of the Lower Village. (See, e.g., Final EIR Mitigation Measure CR-4.) The Lower Village will be developed over the long-term, sometime beyond the year 20212, with no commencement date presently planned. (Draft EIR p. 1.0-36.) Accordingly, the Lower Village site was analyzed in the EIR at the program level of review, and development of the site will undergo additional CEQA analysis prior to project construction. During subsequent development phases, the Lower Village trail system will be designed, and any/all impacts</p>	

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associated with the trails will be assessed. However, it is presently contemplated that the trails to be developed on the Adobe Falls Lower Village site will be developed for use by the residents of the Adobe Falls Faculty/Staff Housing community, not for use by the general public. Therefore, with resident use of the trails, no additional vehicle trips would be generated. Moreover, even if the trails were available for public use, any vehicle traffic generated would be relatively minimal, and would occur primarily on the weekends, outside of the peak traffic hours.

Comment O-4-9	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
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.	The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; an LOS exceeding "D," (i.e., LOS E) is considered by the City to be operating at deficient conditions. Therefore, at LOS C (or D) operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS D, based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.	
Comment O-4-10	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
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.	<p>Mitigation measure TCP-24 requires that following occupancy of the Adobe Falls Faculty/Staff Housing Lower Village, and every six months thereafter, SDSU is to conduct traffic counts on Adobe Falls Road, Mill Peak Road, Capri Drive, Arno Drive, and Genoa Drive, to determine existing roadway average daily trips ("ADT"). At such time as the ADT generated by the Adobe Falls Faculty/Staff Housing Upper and Lower Villages reaches 80% of the total ADT forecast in the EIR, SDSU is required to institute regular shuttle service to the community to ensure project-generated ADT do not exceed the levels forecast in the EIR. (DEIR pp. 3.14-107 to 108.) Because the majority of the vehicle trips to be generated by the faculty/staff housing will be to/from the SDSU campus, it is the traffic engineer's professional judgment that a reduction in traffic of 10% would occur with implementation of the shuttle, and that it is probable the reduction would actually be higher.</p> <p>Therefore, the "full amount of traffic" to be generated by the project is the ADT amount reported in the analysis; following buildout of the Upper and Lower Villages, traffic levels would not exceed the levels forecast in the EIR. Significantly, however, even if the trip generation was not reduced by 10% due to operation of the shuttle as the traffic engineer forecasts, the existing roadways have sufficient available carrying capacity to handle the additional</p>	

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traffic such that even if the amount of project traffic were increased by 10%, each of the Del Cerro roadways would continue to operate at acceptable conditions.

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Comment O-4-11	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
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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.

This comment is an introduction to comments that follow. No further response is required.

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

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Comment O-4-12	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
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At your request I have reviewed the biological elements of the 2007 SDSU Master Plan Revision 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.

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 Bid 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

With respect to the comment regarding winter migratory bird survey work, extensive biological resource survey work has been conducted by Dudek biologists over the last four years as a result of both the proposed SDSU Adobe Falls Faculty/Staff Housing project, and the City of San Diego Metropolitan Waste Water Department's Supplemental Environmental Project (assessment of sewer spill impacts and consequent wetland restoration plan and monitoring program). The level of biological resource effort that has been necessary for the combination of these two projects has resulted in Dudek biologists' gaining an extensive understanding of the habitat types, values, and associated species that have utilized the site over the last four years. Dudek biologists have visited the site during every season, including winter months when winter migrants are most likely to utilize the site. The migrant species (i.e., great egret, etc.) are most likely to utilize the wetland habitat which is largely located on the City of San Diego's land or in areas on the SDSU property that are planned to be avoided during project implementation. It should also be noted that a main component of the City's Supplemental Environmental Project required the removal of non-native, invasive wetland species (i.e., giant reed). Once these species were removed, the creek area was replanted with native wetland species. The removed non-native wetland species were mature, while the replanted native species were not. This has resulted in an interim condition of less vegetative cover which is not as desirable for wintering bird species that may have utilized the site in the past. Once this restoration project reaches maturity, the wetlands onsite (including those proposed as wetland enhancement for the proposed project) would

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become more desirable for wintering avian species. In conclusion, the Adobe Falls area habitat desirable for wintering avian species is almost entirely located within areas that would be conserved either as a result of the City's Supplemental Environmental Project or the proposed SDSU Adobe Falls Faculty/Staff Housing project.

With respect to the comment regarding the San Diego County Bird Atlas (Unitt, et. al., 2004), the Atlas was utilized during preparation of the June 2007 Dudek Biological Resources Technical Report and associated Draft EIR section. However, the reference to this citation was incorrectly written in both of these documents. As the commentor suggests, this comprehensive volume is an important tool for San Diego biologists. The volume was consulted during both 2005 and 2007 biological resource reconnaissance activity and impact analyses. By 2007, a digital avian range spatial database was created from the San Diego County Bird Atlas. During preparation of the biological resource analysis included in Section 3.3.6 of the Draft EIR, Dudek consulted this spatial database. A reference to both the latest version of the written San Diego County Bird Atlas and the associated digital avian range spatial database should have been included in Section 8.0, References of the Draft EIR and Section 9.0 of the June 2007 Biological Resource Technical Report. For this reason, the Final EIR will include the following corrected reference:

Unitt, P.A. 2004. San Diego County Bird Atlas. Proceedings of the San Diego Society of Natural History No. 39. Ibis Publishing Co., Temecula, California. 645 pp. (Including associated digital spatial database).

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### Comment O-4-13

### Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007

### Response

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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 habitat in California. Clearly, the Adobe Falls element of the proposed project is "avoidable." This alternative is apparently not discussed.

Section 1.7.2, Related Project Approvals, (DEIR, p. 1.0-62) includes a list of all possible future regulatory requirements that may be required of the project. The four permit obligations suggested by the commentor are included in this discussion. To expand upon this list, the following discussion is provided:

Construction of the Adobe Falls Faculty/Staff Housing component will require consent for use of the U.S. Army Corps of Engineers "Nationwide Permit 39." Use of this permit will be required to comply with Section 404 of the federal Clean Water Act and Section 10 of the federal Rivers and Harbors Act. These Acts require minimization and avoidance of direct and indirect impacts to wetlands and non-wetland waters of the U.S., "no net loss" of wetlands habitat, and in-kind mitigation for any unavoidable impacts to wetlands and

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waters of the U.S. proposed by a project. The project is proposing direct impacts to approximately 0.48 acre of wetlands and waters of the U.S. The proposed project will also require a California Department of Fish and Game (CDFG) Streambed Alteration Agreement to comply with Section 1602 of the State of California Fish and Game Code, which regulates direct and indirect impacts to wetlands and waters of the U.S. The Streambed Alteration Agreement would permit direct impacts to the streambed of Alvarado Creek and the minor ephemeral and intermittent tributaries located on the Adobe Falls parcels, with adequate minimization of impacts to wetlands, avoidance of impacts to wildlife, and completion of in-kind mitigation for wetlands impacts assuming no "no net loss" of wetlands occurs. The proposed project will also require a Regional Water Quality Control Board (RWQCB) Water Quality Certification (or waiver) to comply with Section 401 of the State of California Clean Water Act and the Porter-Cologne Water Quality Control Act. This permit will certify that the proposed project will have a less than significant effect on long-term water quality and will require that both short-term (construction) and long-term (post-construction) Best Management Practices (BMPs) are adequately incorporated into the project. Finally, the project will require issuance of a federal "take" permit for impacts to the federally-listed threatened coastal California gnatcatcher. Assuming the project will result in impacts to federally-protected wetlands and, therefore, a permit from the US Army Corps of Engineers will be necessary, SDSU will have a "federal nexus" and can process a take permit utilizing the guidelines in Section 7 of the Federal Endangered Species Act. Although not likely given the existing project design information known to-date, should the project be able to avoid all impacts to federally-protected wetlands, thereby eliminating a federal agency nexus, SDSU may prepare a Habitat Conservation Plan (pursuant to Section 10 of the Federal Endangered Species Act) which outlines the provisions for take, and associated mitigation, for the gnatcatcher.

With respect to the comment regarding an "avoidable" alternative, Draft EIR Section 5.0, Alternatives, discusses the avoidance of an Adobe Falls project component altogether. An alternative called the 50% Adobe Falls/No Adobe Falls Alternative is discussed and analyzed in the Draft EIR (DEIR, p. 5.0-16). As indicated in the Draft EIR, the 50% Adobe Falls Alternative would eliminate up to 50% of the potential impacts to sensitive habitats within the Adobe Falls area (DEIR, p. 5.0-19). In response to a comment raised by the USFWS/CDFG, the potential impacts of such a 50% alternative were quantified. Please see Response #1 of the USFWS/CDFG comment letter. The No Adobe Falls Alternative was also discussed in the Draft EIR and concluded that there would be no impacts to sensitive habitats within the

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Adobe Falls area if this alternative were selected (DEIR, p. 5.0-19).

Comment O-4-14	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
<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>All mitigation ratios for wetland impacts associated with development of the Adobe Falls Faculty/Staff Housing project component either meet or exceed those identified in the City of San Diego Biology Guidelines (2004). Unavoidable impacts will be limited to ephemeral and intermittent unvegetated waters of the U.S., as well as minor impacts to isolated stands of mule fat scrub, southern willow scrub, and the edges of disturbed sycamore/cottonwood riparian woodland and disturbed wetlands near the proposed development footprint. All unavoidable impacts to vegetated wetlands (i.e., mule fat scrub, southern willow scrub and disturbed sycamore/cottonwood riparian woodland) are proposed to be mitigated at a ratio of 3:1, and all unavoidable impacts to waters of the U.S. are proposed to be mitigated at a ratio of 2:1, in accordance with the City of San Diego's Biology Guidelines and typical resource agency permit requirements for the San Diego Region. These proposed mitigation ratios include 1 part wetlands creation to satisfy the agency requirements for "no net loss" of wetlands habitats, and 1 or 2 parts wetlands enhancement. The majority of wetlands creation and enhancement is proposed for the Alvarado Creek drainage on the project site. Any proposed wetlands mitigation that cannot be accommodated on the project site will be mitigated off site within an agency approved wetlands mitigation bank or location.</p>	

Comment O-4-15	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
<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>The project is located within the lower San Diego River Watershed, which constitutes the project's general regional setting. Lake Murray is located approximately 2 miles to the east of the proposed project area and Mission Trails Regional Park is located approximately 2 miles to the north. These areas constitute the main open space areas within the general vicinity of the proposed project. A number of state and regionally-identified rare plant and wildlife species are located within the open space preserved by the Mission Trails Regional Park, Lake Murray, Rancho Mission Canyon, and Chaparral Canyon. Rancho Mission Canyon is a regional canyon located in the Navajo neighborhood, to the north of the project site, and Chaparral Canyon is the southernmost segment of Mission Trails Regional Park, located northeast of the project site.</p> <p>The San Diego River and Alvarado Creek, a perennial tributary of the San Diego River, constitute the drainage features within the general vicinity of the proposed project. The San Diego River flows southwesterly through Mission</p>	

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Trails Regional Park, north of the proposed project site, and then flows west towards the Pacific Ocean along the north side of Interstate 8, through Mission Valley. The River is in a relatively natural state for the majority of its course until it reaches Mission Valley where it is abutted by urban land uses. Alvarado Creek originates at the south end of Lake Murray and the Chaparral Canyon Open Space Area and then flows south beneath Interstate 8 and west through a portion of the main SDSU campus. The creek again traverses Interstate 8 near SDSU Parking Lot A, daylighting along the northern slope of Interstate 8 at the site of "Adobe Falls," a historic complex of pools and braided stream channels. The creek continues north, traversing SDSU's undeveloped Adobe Falls parcel before it enters a concrete channel along the western edge of the SDSU ownership. The concrete channel carries the water for one mile, to its convergence with the San Diego River.

The main SDSU campus is located on a mesa along the southern rim of Mission Valley. This mesa and valley is one of a series of mesa and valley complexes that comprise the lower San Diego River watershed and contain the main stem of the river, as well as several tributaries. The main campus is located adjacent to a series of north-south trending canyons vegetated with coastal sage scrub and chaparral habitats which are truncated by Interstate 8. The portions of the campus atop the mesa are surrounded by dense commercial and residential development. The SDSU-owned Adobe Falls parcels are located within the eastern end of the broad valley immediately north of the main campus and Interstate 8. The majority of the Adobe Falls parcels are located within a canyon which is surrounded by residential developments to the north, east, and west, and steep vegetated slopes associated with Interstate 8. Steep hillsides dominated by chaparral, non-native grassland, and ornamental plantings are located north of the residential development that immediately surround the Adobe Falls parcels. Residential development is located atop these mesas north of the Adobe Falls site.

The Adobe Falls site includes two broad, gentle slopes divided by the main flow channel of Alvarado Creek. At the southern end of the SDSU-owned Adobe Falls parcel, Alvarado Creek flows through the "Adobe Falls" before heading north (onto City of San Diego-owned land) and then finally west toward the San Diego River, located approximately 1 mile downstream. The western portion of the Adobe Falls site drains northward toward the Alvarado Creek floodplain. The eastern portion of the Adobe Falls site slopes southward and westward and, therefore, drains toward Interstate 8 and Alvarado Creek, respectively. The western portion of the site is approximately 100 feet lower in elevation compared to the eastern portion of the site. The



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site is vegetated with coastal sage scrub, chaparral, native and non-native grassland and wetlands and riparian woodlands associated with the Alvarado Creek drainage and its unnamed tributaries that traverse the SDSU parcel. The Adobe Falls site is unique in that it is surrounded by residential development and a major transportation corridor, yet is a relatively large, undeveloped parcel containing a variety of native upland and wetland habitats.

Comment O-4-16	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
<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>As the commentor notes, approximately 9.51 acres of coastal sage scrub, baccharis scrub, southern mixed chaparral and annual grassland will be preserved in place on the Adobe Falls parcels following completion of the Upper and Lower Village developments. Much of this habitat will be included as upland buffers to Alvarado Creek and the associated wetlands located along the boundaries of the Adobe Falls parcels. The remaining habitat either will occur along the south boundary of the parcels, near Interstate 8 or along the outside edges of the parcels away from the wetlands on site. The majority of this upland habitat to be preserved on the project site will ensure that relatively large areas of contiguous habitat are present between the proposed residential developments and the preserved wetlands on or adjacent to the proposed project site. This upland habitat is being left in place to provide adequate nesting and/or foraging habitat for many of the resident wildlife species that are present within the adjacent wetlands, and to provide cover for other species that may travel to or through the area. More specifically, the on site preservation of coastal sage scrub habitat may help ensure that the coastal California gnatcatcher can successfully utilize the remaining habitat on the project site for foraging and/or nesting after project construction. The preservation of upland habitat on the project site will provide relatively large areas of contiguous native habitats along the Alvarado Creek drainage. Smaller areas of native vegetative cover will surround the outer edges of the proposed villages and will facilitate movement of the gnatcatcher and other wildlife species around and through the project site. Approximately 10 acres of habitat is not insignificant given the gnatcatcher's ability to fly from habitat block to habitat block; this preserved habitat onsite will potentially aid in the gnatcatcher's survival within the remaining canyon areas of the City of San Diego.</p>
Comment O-4-17	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
<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 minimum 2:1 ratio independent of and in addition to</p>		<p>As indicated in the Draft EIR, the project site supports four sensitive plant species: San Diego marsh elder, southwestern spiny rush, California adolphia and San Diego County vigueira. The project will avoid all impacts to the San Diego marsh elder and southwestern spiny rush due to proposed</p>

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impacts to sensitive habitats. Discussion of thresholds of significance for impacts to sensitive plant species is inadequate and needs to be revisited. If any habitat on the site is deemed worthy of preservation, then impacts to any impacted sensitive species on the site should be appropriately mitigated.

preservation of their onsite habitats. As indicated in the Draft EIR (DEIR, p. 3.3-69), the project would impact all 45 California adolphia and 75 San Diego County viguiera plants located within the Upper Village site. The CEQA threshold that was used to evaluate the significance of potential impacts to the California adolphia and San Diego County viguiera asks whether a project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game and US Fish and Wildlife Service (DEIR, p. 3.3-60). The following considerations were used in determining whether the project would have a "substantial adverse effect" on either of these species:

California adolphia is a California Native Plant Society List 2.1 plant which indicates that it is rare or endangered in California but common outside of the state. The Draft EIR indicated that impacts to the California adolphia species would not be significant for three main reasons: 1) while this plant is rare in the State of California, it is found in sufficient numbers outside of the state and therefore its potential for extinction is low at this time, 2) the size of the onsite population is small; and 3) there are many known populations of this species throughout the region, many of which are located in protected areas including the City of San Diego Multiple Habitat Preservation Area (DEIR, p. 3.3-69 – 70).

San Diego County viguiera is a California Native Plant Society List 4.2 species, indicating that it is simply on a "watch list." The impacts to this species are not considered significant for three main reasons: 1) the amount of habitat and size of the population would not constitute a significant loss of this species, 2) this species is rare, but found in sufficient numbers regionally, especially in protected areas including the City of San Diego Multiple Habitat Preservation Area and 3) as indicated by the California Native Plant Society, placement on List 4 indicates that vulnerability or susceptibility to extinction appears low (DEIR, p. 3.3-69 – 70).

While impacts to these plants would not constitute a substantial adverse effect, in an effort to take into consideration comments and suggested mitigation raised by this commentor, a mitigation measure will be added to the EIR providing that prior to grading, in an effort to preserve the genetic diversity of these species, SDSU shall make every attempt possible to salvage the California adolphia and San Diego County viguiera individuals. Should a SDSU Field Station be developed within the Adobe Falls canyon, students

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and faculty associated with the field station may be available to assist with salvage and translocation efforts. Assuming salvage is possible prior to grading, translocation can occur onsite within the coastal sage scrub habitat planned for conservation immediately west of the proposed Upper Village development.

Comment O-4-18	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
<p>6. The EIR mentions potential impacts to changes in hydrology resulting from the project, especially with reference to direct and indirect impacts from run off 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>The EIR discusses impacts to hydrology and water quality due to the proposed development of the Adobe Falls site, which is currently undeveloped and therefore functions as such from a drainage perspective (DEIR, Section 3.7). The analysis outlined in Section 3.7 determined that development of the site would reduce on-site infiltration as a result of an increase in impervious surfaces in presently undeveloped areas that either drain to Alvarado Creek or naturally percolate into the soil. (DEIR p. 3.7-16.) DEIR Table 3.7-3, Peak Flow Summary, illustrates that, following project development, the peak flow rates of Alvarado Creek at the point where the creek leaves the Adobe Falls site would be increased by 2.5 cubic feet per second ("cfs") for an 85th percentile storm event (an 85th percentile storm event represents a "first flush" rain event), 4.38 cfs for a 2-year storm event, 7.13 cfs for a 10-year storm event, and 10.14 cfs for a 100-year storm event. (DEIR pp. 3.7-16 and 3.7-18.) The DEIR determined that the increase in runoff volumes for each storm event represented a potentially significant impact. (DEIR p. 3.7-16.)</p>	<p>Increased storm water flows and untreated runoff from the Adobe Falls site could potentially directly or indirectly impact existing biological resources on and adjacent to the project site. Additional storm water runoff quantity or velocity could result in increased erosion on the Adobe Falls site or immediately downstream of the site within the remaining naturalized portions of Alvarado Creek. Increased storm water runoff quantity or velocity may potentially result, during high flows, in loss of vegetative cover established along the naturalized portions of Alvarado Creek including the City of San Diego's Adobe Falls Supplemental Environmental Project area (located immediately north of the SDSU Adobe Falls Faculty/Staff Housing site). Additional storm water flows could potentially decrease water quality on or downstream of the project site. Water that contains oils, grease and other pollutants (which is often found in untreated run-off leaving developed areas) could negatively impact native plant establishment, aquatic wildlife health and/or reproductive cycles. These negative effects could in turn have indirect or direct effects on wildlife species higher on the local food chain.</p>

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In response to this potentially significant impact, the DEIR includes mitigation measure HWQ-2, which requires that prior to the preparation of final design plans for the Adobe Falls Faculty/Staff Housing Upper and Lower Villages, SDSU shall conduct a detailed site-specific hydrologic analysis to further assess the effects of the proposed project on the flood plain and downstream streambed capacities, based on the analysis results, on-site detention facilities may be required. (DEIR p. 3.7-29.) Should the projected flows result in an increase over the existing condition, onsite detention would be required. This would ensure that the same hydrology would be present post-construction as currently exists within the Alvarado Creek drainage system. Similarly, Mitigation Measure HWQ-1 and HWQ-11, (DEIR, p. 3.7-28-29, 3.7-32), outlines best management practices that shall be incorporated into the final design plans. These measures would ensure that any run-off leaving development areas would be of similar or higher quality compared to water currently draining from the undeveloped SDSU property, into the Alvarado Creek aquatic system. In addition, Best Management Practices (BMPs) will be incorporated on the project site per the RWQCB 401 permit and the site specific storm water management plan that will ensure that wildlife and habitat downstream and/or adjacent to the project site are not directly or indirectly impacted by low water quality, erosion, sedimentation or other unanticipated effects associated with development of the project site.

Comment O-4-19	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
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		While the specifics of wetland and upland restoration, creation and preservation have not been determined at this stage of the project, Figures 3.3-9 and 3.3-10 have been prepared to generally describe the areas that mitigation activity would take place both on and off site. Figures 3.3-9 and 3.3-10 notes each restoration, creation and preservation area (both uplands and wetlands) proposed and outlined in Mitigation Measures BR-1 and BR-2 (DEIR, p. 3.3-75). The Final EIR will include Figures 3.3-9 and 3.3-10.
Comment O-4-20	Comments from Del Cerro Action Council (Anne Brunkow), 7/27/2007	Response
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 impact related to fuel abatement requirements. A Fuel Management Plan is critical to assessing		Any required brush management activity shall occur entirely within the delineated project impact areas outlined on Draft EIR Figures 3.3-2 and 3.3-3 (DEIR, p. 3.3-10 and 3.3-14, respectively). No brush management shall occur within the wetland buffer area or undeveloped upland areas. See Final EIR Mitigation Measure BR-17.  The proposed development footprint described and analyzed in the Draft EIR incorporates a wetland buffer ranging from 25 to 75 feet. In general, buffer widths were determined based on the type of wetland area that was in need of

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actual and potential impacts to biological resources. No such discussion or analysis is presented.

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

protection, as well as the topography present nearby these sensitive areas. In many cases, topographic differentiation established a logical beginning/ending point for a buffer. A minimum 25-foot buffer was established along the perennial tributary to Alvarado Creek that conveys storm water flows from a culvert outlet on the southwest corner of the Adobe Falls site to Alvarado Creek to the south. This stream channel is three feet wide on average, incised up to 10 feet and surrounded by relatively steep slopes along the east and west. Wetlands and upland habitat up to 200 feet wide will be preserved in place and enhanced on the west side of this stream channel. A 25 foot buffer was initially established along the east side of this channel to conform to the steep slope that parallels this drainage and provide an overall buffer ranging in width from 100 to 250 feet wide along the stream channel. A general 75 foot wide buffer was initially established along the south edge of the floodplain of Alvarado Creek to conform with the present topography and native vegetation adjacent to the floodplain and wetlands associated with the stream. This includes an area of buffer surrounding the cismontane alkali marsh on the SDSU Adobe Falls Lower Village site that extends over three hundred feet north of Alvarado Creek. The portions of the stream channel, floodplain marsh area and designated wetlands buffer that occur on the SDSU Adobe Falls Lower Village site will also be preserved. Finally, Mitigation Measure BR-8 (DEIR, p. 3.3-77 – 78), states that buffer areas shall be further developed during final design. BR-8 states that a 100-foot buffer shall be maintained along the floodplain of Alvarado Creek.

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### Comment O-5-1

### Comments from Alvarado Hospital (Harris F. Koenig), 7/27/2007

### Response

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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.

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San Diego State University acknowledges your input and comment and looks forward to continuing to work with Alvarado Hospital in furtherance of this important project, and to address the concerns raised in your letter. The comments will be included as part of the record and made available to California State University Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.

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### Comment O-5-2

### Comments from Alvarado Hospital (Harris F. Koenig), 7/27/2007

### Response

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 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.

The Draft EIR analyzes the project's potential impacts on emergency medical services, generally, and specific to Alvarado Hospital, at pages 3.13-27 through 3.13-29. The EIR determined that while the proposed project would increase vehicle traffic and congestion in the vicinity of SDSU, it is not expected that the increased traffic would result in significant impacts in the form of increased emergency response times. The EIR reached this conclusion based on the following reasons. First, emergency response vehicles have the right-of-way and are exempted from rules of the road in emergency situations. Therefore, surrounding traffic must yield the right-of-way and immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and stop until the emergency vehicle has passed. Second, the roadway configuration of Alvarado Road is such that there is adequate right-of-way for emergency vehicles to maneuver around traffic, even under congested conditions. Third, communications with emergency service providers in the area confirmed that emergency vehicles generally have the ability to go where they need to go in the event of an emergency, and in the event of traffic congestion have the ability to maneuver through the congestion. (Draft EIR pp. 3.13-28 - 29; see also, Transportation/Circulation and Parking, p. 3.14-98.) Therefore, since no significant impacts were identified, there is no requirement under CEQA that any mitigation relative to emergency vehicle access be adopted. For this reason, it is not necessary that any measures to improve emergency access to the hospital that might be agreed to by SDSU, the City of San Diego, and Alvarado Hospital be agreed to prior to project approval.

Additionally, the comment is incorrect in stating there is no mention in the EIR as to mitigation of traffic congestion during project construction. As noted at Draft EIR page 3.13-29 (in the discussion regarding emergency response times), during construction of the proposed project, a traffic control plan ("TCP") would be implemented to mitigate the impact caused by construction activities on traffic congestion and delay. The TCP would require that special attention be paid to Alvarado Road and the potential effect of construction-related traffic on Alvarado Hospital emergency access. The TCP would be prepared under mitigation measure TCP-25, which is included in the Transportation/Circulation and Parking section at page 3.14-108. (The Transportation/Circulation and Parking section analyzes Emergency Access Impacts at page 3.14-98.) The TCP would require that a minimum of one lane of travel on Alvarado Road remain open at all times during project construction; that flagmen be utilized to assist in the direction of traffic when

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necessary; that emergency response providers be given notice of temporary road lane reduction; and that construction activities, including road lane reductions or temporary closures and the movement of heavy equipment, occur during off-peak periods to the maximum extent feasible. (Draft EIR p. 3.14-108.)

Comment O-5-3	Comments from Alvarado Hospital (Harris F. Koenig), 7/27/2007	Response
<p>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.</p>	<p>Under the California Supreme Court's ruling in City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341, SDSU/CSU's power to mitigate the effects of the project is ultimately subject to legislative control; if the Legislature does not appropriate the funds necessary to mitigate the significant impacts of the project to the jurisdictional public agency, then CSU does not have the power to mitigate the project's effects. (39 Cal.4th at 367.) Therefore, as the Draft EIR notes in the Transportation/Circulation and Parking section, SDSU's fair-share funding commitment towards the identified roadway improvements is necessarily conditioned upon 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. (Draft EIR p. 3.14-117.) However, the law does not require that SDSU abandon the project, or parts of the project, in the event the Legislature denies funding of the identified roadway mitigation. Please also see General Response 3, City of Marina Compliance, for additional information responsive to this comment. The Hospital's comment that development of the proposed project should not proceed without appropriate funding to mitigate the traffic impacts of the project will be included as part of the record and made available to SDSU and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.</p> <p>With respect to the EIR's references to the "fair-share" of the cost to provide mitigation for project impacts, under the law, SDSU/CSU is not required to pay more than is necessary to mitigate the significant impacts of the proposed project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina, 39 Cal.4th at 361-362.) The fair-share amounts were calculated based on a formula routinely used by the City of San Diego. (DEIR pp. 3.14-108 to 110.)</p>	
Comment O-5-4	Comments from Alvarado Hospital (Harris F. Koenig), 7/27/2007	Response
<p>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</p>	<p>Draft EIR Section 3.14, Transportation/Circulation and Parking, addresses the proposed project's impacts on the levels of service of the surrounding roadways and intersections. The section is based on the Traffic Impact</p>	

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believe that significant deterioration of levels of service that are related to this project will need to be mitigated as part of this project.

Analysis, SDSU 2007 Campus Master Plan Revision, prepared in June 2007 by the traffic engineers Linscott Law & Greenspan. (Draft EIR p. 3.14-1.) The Traffic Impact Analysis is included in its entirety in Appendix N of the Draft EIR. Based on the Traffic Impact Analysis, the Draft EIR contains 26 mitigation measures, most of which are in the form of physical roadway improvements, to address the project's potentially significant impacts to traffic. (See Draft EIR pp. 3.14-102 - 108.)

Comment O-5-5	Comments from Alvarado Hospital (Harris F. Koenig), 7/27/2007	Response
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.		San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.
Comment O-6-1	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
<p>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.</p> <p>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.</p> <p>A. The Vehicle counts for the College Avenue segment from Del Cerro Blvd. to 1-8 ramps are not generalizable.</p> <p>SDSU's Draft EIR states its experts conducted traffic volume counts at inappropriate times, resulting in skewed Average Daily Totals (ADTs).</p> <p>With respect to the segment of College Avenue from Del Cerro to 1-8, 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</p>		<p>The comment that the traffic volume counts were conducted at "inappropriate" times is incorrect. Traffic counts of the existing AM and PM peak hour traffic volumes were conducted at the study area intersections and roadway segments in September 2006 and February 2007 while all local schools were in session. (Draft EIR ("DEIR") p. 3.14-20.) Additionally, EIR Section 3.14.4.2 addresses the existing traffic volumes in the project study area, and accounts for the traffic generated by all of the uses in the Del Cerro community, including the school at Temple Emanuel on Del Cerro Boulevard.</p> <p>CSU/SDSU acknowledges the community's concerns with respect to the potential traffic impacts to the Del Cerro community that would result with development of the Adobe Falls Faculty/Staff Housing component of the proposed project. However, as presented in EIR Section 3.14, based on applicable City of San Diego roadway standards, the existing Del Cerro roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls project will add additional traffic to the Del Cerro community roadways, the amount of additional traffic can be accommodated by the existing roadway system without resulting in significant impacts under CEQA.</p> <p>The EIR also notes that vehicle speeds on these streets, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-</p>



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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.

99.) In response, the EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study is to focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel school. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Comment O-6-2	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
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 with the residential area surrounding the proposed 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 his 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.	The San Diego Traffic Engineering Council Regional Guidelines regarding the 50 peak-hour trips threshold does not apply to low traffic volume, unsignalized intersections. This guideline only applies to signalized intersections along designated, regionally significant arterials such as College Avenue, as specified by the City of San Diego Traffic Impact Study Manual.	
Comment O-6-3	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
C. Impact of Adobe Falls on Emergency Health Services. 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.	As discussed in EIR Section 3.14, the proposed Adobe Falls Faculty/Staff Housing project component would not result in significant impacts relating to traffic and, therefore, the additional traffic associated with the proposed project would not result in a significant impact to emergency medical service access. Additionally, as discussed in DEIR Section 3.13, Public Utilities and Services Systems, emergency response vehicles have the right-of-way and are exempted from rules of the road in emergency situations. Therefore, any surrounding traffic that would be on the roadways must yield the right-of-way and immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and stop until the emergency vehicle has passed. (DEIR pp. 3.13-28 - 29; see also, Transportation/Circulation and Parking, p. 3.14-98.)	
Comment O-6-4	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
D. Missing data for trips generated by Adobe Falls project.	The comment is incorrect and appears to be referring to the project that was proposed in 2005 and analyzed in the corresponding 2005 EIR. The currently proposed Adobe Falls Faculty/Staff Housing project component will not include a "park" site open to the general public and, therefore, will not	
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		

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acres of park/open space: Later, SDSU estimates there will be 20.6 acres of park space, at a rare 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.

generate additional vehicle trips. Amenities to be developed as part of the Lower Village, for use only by residents of the Adobe Falls Faculty/Staff Housing, tentatively include a swimming pool, a resident clubhouse/meeting space, and recreation areas. (DEIR p. 1.0-41.)

Comment O-6-5	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
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 under calculated the daily trips generated by at least 300 trips per day. SDSU must correct this calculation.	The comment is incorrect and appears to be referring to the project that was proposed in 2005 and the prior EIR. The EIR traffic analysis utilized a trip generation rate of 8 average daily trips ("ADT") per dwelling unit for all Adobe Falls Faculty/Staff Housing units. (See DEIR p. 3.14-37 and 3.14-89.)	
Comment O-6-6	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
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.	The comment is incorrect and appears to be referring to the project that was proposed in 2005 and the prior EIR. The EIR traffic impacts analysis does not assign a capacity of 2,200 ADT to any of the streets in the Del Cerro area. (See DEIR p. 3.14-69.)	
Comment O-6-7	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
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.	The comment is incorrect and appears to be referring to the 2005 EIR traffic impacts analysis. The current EIR traffic impacts analysis presented in the Draft EIR assigned the roadway "collector" designation to Del Cerro Boulevard, consistent with the designation provided in the Navajo Community Plan. (DEIR p. 3.14-11.) The impacts analysis assigned a "residential local	

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street" classification to the remainder of the streets in the Del Cerro community. (DEIR pp. 3.14-11 - 13.) The Del Cerro roadway classifications utilized in the EIR traffic impacts analysis are based on actual on-site roadway conditions, and are consistent with the City of San Diego Street Design Manual and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications.

Comment O-6-8	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
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. Transportation, City of San Diego Planning Department, April 19, 2004; <a href="http://www.sandiego.gov/planning/pdf/ecdc/navajo/5trnavajo.pdf">www.sandiego.gov/planning/pdf/ecdc/navajo/5trnavajo.pdf</a> .) 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.	As discussed in the response to comment O6-7, the EIR traffic impacts analysis assigned the roadway "collector" designation to Del Cerro Boulevard, consistent with the designation provided in the Navajo Community Plan. (DEIR p. 3.14-11.) The "collector" classification is based on actual on-site roadway conditions, and is also consistent with the City of San Diego Street Design Manual, and the Traffic Impact Study Manual. With respect to the remaining street segments, as noted in response to comment O6-7, the impacts analysis assigned a "residential local street" classification to the remainder of the streets in the Del Cerro community, with a capacity of 1,500, consistent with the comment. (DEIR pp. 3.14-11 - 13.)	
Comment O-6-9	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
Nevertheless, even under SDSU's classifications, that 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.	The comment is referring to the 2005 EIR traffic impacts analysis; Table 3.13-17 is from the 2005 document. In any event, it would be incorrect under standard engineering practices to use a street segment analysis to analyze the section of Del Cerro Boulevard between Capri Drive and College Avenue since the referenced segment is approximately only 500 feet in length. Given its proximity to the College Avenue intersection, the flow on this portion of roadway is directly controlled by the signalized Del Cerro Boulevard/College Avenue intersection. Under roadway conditions as these, it is standard engineering practice to utilize a computerized intersection analysis to determine the impacts of a project on a short segment with a signalized intersection at the terminus. Furthermore, Del Cerro Boulevard contains an extra eastbound travel lane near Capri Drive on the approach to College Avenue, thereby providing additional capacity at that specific location, with three travel lanes (two eastbound and one westbound).	
Comment O-6-10	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
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	The comment is referring to the 2005 EIR traffic impacts analysis and, therefore, is not applicable to the current EIR, which includes roadway improvement mitigation measures that require SDSU contribute to the City of San Diego its fair-share of the costs to provide the improvement. See DEIR	

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requires SDSU to adopt feasible mitigation measures to avoid significant environmental impacts. (Sierra Club v. State Board of Forestry (1994) 7 Cal.4th 121 5, 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.

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.

pp. 3.14-102 - 108. Consistent with the California Supreme Court's ruling in City of Marina v. Board of Trustees of The California State University (2006) 39 Cal.4th 341, the university's fair-share funding commitment is necessarily conditioned upon requesting and obtaining funds from the California Legislature. If the Legislature does not provide funding, or if funding is significantly delayed, the identified significant impacts would remain significant and unavoidable. (DEIR p. 3.14-117.)

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### Comment O-6-11

### Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007

### Response

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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.

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

The premise of the comment is incorrect. The EIR assessed the potential impacts of the proposed project on air quality by estimating the emissions associated with both the construction and operation of the proposed project, including emissions from the Adobe Falls Faculty/Staff Housing component, adding these emissions to the existing background air quality levels, and then measuring the resulting levels against the applicable air quality standards. (See DEIR Section 3.2, Air Quality.)

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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 92126 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.

Separate from this impacts analysis is a determination whether the proposed project is consistent with the San Diego Air Quality Management Plan ("AQMP"), a regional planning document. As discussed in EIR Section 3.12, Population and Housing, the project is consistent with SANDAG's regional growth forecasts and it is, therefore, consistent with the AQMP.

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**Comment O-6-12****Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007****Response**

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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.

The comment is incorrect in that the Draft EIR discusses the potential impacts of the proposed Adobe Falls Faculty/Staff Housing project component on the San Diego River from a water quality/drainage perspective, and from a land use and planning perspective.

Draft EIR Section 3.7.3.2, General Hydrologic Setting, notes that the proposed project lies within the San Diego Hydrologic Unit, Lower San Diego Hydrologic Area and Mission San Diego Hydrologic Subarea (in effect, the San Diego River watershed). The EIR acknowledges that all existing and proposed runoff from the project, including the Adobe Falls Faculty/Staff Housing component, will enter the San Diego River via Alvarado Creek, which runs through the Adobe Falls site, or other unnamed tributaries. (DEIR p. 3.7-2.)

Specific to the Adobe Falls Faculty/Staff Housing project component, the EIR determined that development of the Adobe Falls site will reduce infiltration as a result of an increase in impervious surfaces in presently undeveloped areas that either drain to Alvarado Creek or naturally percolate into the soil. (DEIR p. 3.7-16.) This would result in an increase in stormwater runoff to Alvarado Creek and a potential increase in pollutant loads. To reduce any potential water quality impacts to the Alvarado Creek and, by extension the San Diego River, Mitigation Measure HWQ-1 provides that during the design phase of the Adobe Falls Faculty/Staff Housing project component, SDSU is required to implement certain "best management practices" into the project site design, including reserving Alvarado Creek and nearby steep slopes as open space; constructing community streets, sidewalks and parking lot aisles to the minimum widths necessary; incorporating landscape treatment for parking lot runoff; using porous materials to construct walkways, alleys and other low-traffic areas; preserving existing native trees, and planting new trees, to maximize canopy interception and water conservation; draining rooftops into adjacent landscaping prior to discharge to the storm drain; vegetating slopes with native or drought tolerant vegetation; and, installing energy dissipaters at the outlets of new storm drains that enter the Alvarado Creek. (DEIR pp. 3.7-28 - 29.)

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From a land use and planning perspective, the Draft EIR addressed the consistency of the proposed project with the San Diego River Conservancy's Five Year Infrastructure Plan. (See DEIR pp. 3.8-30 - 31.)

Comment O-6-13	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
<p>More significantly, must 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.</p>	<p>The geotechnical data for the Adobe Falls Faculty/Staff Housing area is based on several references, as well as observations of the existing surficial geological and soil conditions made during field reconnaissance of the site by a professional geologist. While some of the references may be 30 years old, this technical information remains pertinent because the majority of the property is in a condition similar to its condition 30 years ago. In addition, more recent references, including the City of San Diego's 1995 Seismic Safety Study and the California Division of Mines and Geology's 1995 open-file report addressing landslide hazards, also were reviewed in conducting the analysis.</p> <p>With respect to mitigation to improve the quality of Alvarado Creek or the San Diego River, as discussed in response to comment O6-12 above, the proposed project includes mitigation that would reduce the project's potential impacts on the water quality of Alvarado Creek and, by extension, the water quality of the San Diego River.</p>	
Comment O-6-14	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
<p>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.</p>	<p>The referenced ancient landslide is located off-site of the Adobe Falls Lower Village site, and is not an active landslide. (DEIR p. 3.5-9.) Therefore, the landslide does not pose a potentially significant impact and mitigation is not required. As part of the project development, however, SDSU will conduct a geotechnical investigation in conformance with the requirements of the California Building Code and Uniform Building Code. Based on the results of the site-specific investigations, geotechnical design recommendations will be developed and included within each respective project component's design and construction in conformance with applicable requirements. (DEIR p. 3.5-19.)</p>	
Comment O-6-15	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
<p>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</p>	<p>The referenced Genoa Drive slope failure is located off site and to the north of the Adobe Falls Faculty/Staff Housing site. The slope failure was not on the project site. Based on discussions with a City of San Diego geologist, the slope was stabilized in accordance with an engineered repair plan and is performing well.</p>	

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slope failures in this area.

With respect to mitigation, as noted in response to comment O6-14, as part of the project development SDSU will conduct a geotechnical investigation in conformance with the requirements of the California Building Code and Uniform Building Code. Based on the results of the site-specific investigations, geotechnical design recommendations will be developed and included within each respective project component's design and construction in conformance with applicable requirements. (DEIR p. 3.5-19.)

Comment O-6-16	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
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.		As discussed in the prior responses to comments, and as presented in the Draft EIR, the traffic analysis is not flawed and, therefore, the Draft EIR accurately assesses the project's potential noise impacts.
Comment O-6-17	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
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 515126.6, discussion of each alternative should be sufficient to allow meaningful evaluation, analysis and comparison with the proposed project."		The comment appears to be suggesting that the proposed SDSU enrollment increase be shifted to the CSU San Marcos campus. However, as that comment notes, CSU San Marcos is already slated to enroll approximately 19,162 more FTES, or approximately 24,600 more headcount students when buildout is complete, which should be within the next 10 to 20 years. Therefore, student enrollment at CSU San Marcos will reach the targeted goals without the addition of increased students forecast to be enrolled at SDSU over the next 15 to 20 years.
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 19,183 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 <a href="http://www.calstate.edu/PA/info/enroll.shtml">www.calstate.edu/PA/info/enroll.shtml</a> ; and CSUSM Master Plan, <a href="http://www.csusm.edu/physical planning/Facilities/Master Plan.htm">http://www.csusm.edu/physical planning/Facilities/Master Plan.htm</a> .) <sup>1</sup> This is nearly double the amount of growth currently projected for the region by the year 2011.		Additionally, since 1999, when CSU/SDSU was declared an impacted campus, CSU/SDSU has been inundated with undergraduate applications. In an attempt to further manage impactation, the enrollment service area for CSU/SDSU was narrowed to those students living south of Route 56, an attempt to re-direct students to CSU San Marcos. That effort has meant that students who apply from outside the CSU/SDSU service area need an increased level of academic preparation. By law, all students within the service area who are CSU eligible are admitted to CSU/SDSU first. However, the application level has continued to increase. Therefore, simply re-directing students to another CSU campus, which may or may not have capacity, would not meet the needs of the community, nor the mission of CSU and SDSU.
Comment O-6-18	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
B) Brawly and Calexico Alternative. Further, SDSU's off-campus centers in		SDSU's enrollment projections properly account for the projected increases in

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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.)

enrollment at the Imperial Valley Calexico (IVC)/Brawley campus. As shown in the EIR, SDSU projects enrollment at the IVC/Brawley campus to increase from 873 students in 2006-07 to 2,500 in 2024-25. This increase in enrollment at the off-campus location was factored into SDSU's enrollment planning projections.

Comment O-6-19	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
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, <a href="http://www.cpec.ca.gov/OnLineData">www.cpec.ca.gov/OnLineData</a> , Enrollment for SDSU, 1987[1987: 38,280 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.	<p>The need for higher education in California is on the rise. Recognizing the need to provide additional support for public higher education, the California Department of Finance projects CSU enrollment will increase 19 percent between 2005 and by 2015; from a system wide enrollment of 405,282 in 2005 to 482,367 students by 2015. Additionally, the Public Policy Institute of California predicts by 2013 there will be a shortfall in the availability of higher education for more than 686,000 students in our state.</p> <p>CSU is currently planning to provide access for these students. In May 2003, the California State University (CSU) Board of Trustees recognized higher education enrollment projections had begun to exceed the system's physical capacity. At that time, they requested that campuses develop strategies to meet the CSU mission for student accessibility stressing that campuses should focus on strategies to provide instruction while developing plans to continue to meet the California Master Plan for Higher Education promise of access to a high-quality education.</p> <p>The CSU Board of Trustees made it clear that campuses were to meet future increased enrollment needs by expanding service on its current campuses. CSU recognized that each campus faces different physical capacity limits and enrollment demands. These variations required that individual campuses review available options and encourage policies that could provide flexibility to best serve future students.</p> <p>CSU responds to enrollment demand at the campuses experiencing enrollment demand where it exists. With over 58,000 undergraduate applications to SDSU for fall 2007, for approximately 9,000 openings, the demand clearly exists to expand campus enrollment at SDSU.</p>	
Comment O-6-20	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
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	The comment refers to events and information related to the 2005 project and EIR and is not applicable to the current project and EIR. SDSU's student and government workforce population projections were provided to SANDAG in 2005, prior to SANDAG's most recent update to the 2030 Regional Growth	



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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.

Forecast (September 2006) and, therefore, the information was available to SANDAG for inclusion in its current growth forecast. (DEIR p. 3.12-14.)

Comment O-6-21	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
<p>V) ADDITIONAL ISSUES. In addition to the categorical problems identified above, the following issues must also be addressed.</p> <p>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.</p>	<p>The Draft EIR traffic impacts analysis accounts for the existing grade on Mill Peak Road. The grade on Adobe Falls Road/Mill Peak Road is one of the reasons that the proposed project may result in what is perceived to be a potentially significant impact in terms of travel speeds on the residential streets. (See DEIR p. 3.14-99.) Mitigation measure TCP-23 requires the preparation of a traffic calming study, and SDSU's fair-share contribution of the costs to implement the measures identified in the study. (DEIR p. 3.14-107.)</p> <p>With respect to noise impacts, Draft EIR Section 3.10 analyzed the potential impacts associated with the proposed project and determined that the increased traffic in the Del Cerro community would result in increased noise levels ranging from approximately one to five decibels. (DEIR p. 3.10-14.) The resulting noise levels would not exceed 61 dB and, therefore, would be well within the permissible 65 decibel level range. Specific to Adobe Falls Road/Mill Peak Road, any potential increase in vehicle noise levels attributable to the grade (a 10-20% grade) would be no greater than 2 dB and, therefore, resulting noise levels would not exceed 56 dB CNEL, a level well within permissible limits.</p>	
Comment O-6-22	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
<p>B) Properly 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.</p> <p>Specifically, the project conflicts with Goal #5, which is to:</p> <p>"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. . . ."</p> <p>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</p>	<p>EIR Section 3.8.6.2 analyzes the consistency of the proposed project with the City's General Plan. Table 3.8-1, City of San Diego Progress Guide and General Plan Consistency Analysis, provides an analysis of the proposed project against each of the City's overall goals and objectives. The analysis was conducted relative to the proposed project as a whole, which includes the Adobe Falls Faculty/Staff Housing, Alvarado Campus, Alvarado Hotel, Campus Conference Center, Student Housing, and Student Union Expansion. While certain individual components of the proposed project may appear inconsistent with specific individual goals and/or objectives when viewed in isolation, the analysis determined that as a whole the proposed project is consistent with the City's goals and objectives. (DEIR p. 3.8-20.)</p> <p>Specific to Objective #1, the proposed project will protect the environmentally sensitive areas within the Adobe Falls site, leaving almost 16 acres of the 33-</p>	

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"Protect environmentally sensitive areas" such as Adobe Falls; and #2 is to "Protect single family neighborhoods from incompatible development".

acre site as undeveloped open space. (DEIR p. 1.0-41.) Additionally, any potentially significant impacts to sensitive habitat or species that may result with implementation of the proposed project will be fully mitigated. (See Section 3.3, Biological Resources, mitigation measures, pp. 3.3-72 - 79.) Specific to Objective #2, while the proposed project would introduce a new campus-related multi-family residential development into a previously undeveloped area, the Adobe Falls project site is surrounded on three sides by existing residential uses (multi-family to the west, single-family to the north and east). Therefore, the proposed project would be consistent with the development patterns currently present and the existing residential nature of the neighborhood. (See DEIR p. 3.8-16.) Additionally, there is no evidence to suggest that development of the proposed Adobe Falls Faculty/Staff Housing would have a negative effect on surrounding property values.

In any case, SDSU is part of the California State University system. As such, CSU/SDSU is exempt from local regulations, such as the City's General Plan, the Navajo Community Plan, and local zoning laws and regulations. The exemption is based on the doctrine of sovereign immunity. The immunity applies where, as here, the state (CSU/SDSU) is operating in a governmental capacity by utilizing its power and responsibility in connection with the construction and development of SDSU - a state university campus. See Education Code §66606.

The only applicable land use plan for a CSU campus is the Campus Master Plan. The SDSU Campus Master Plan, which depicts campus boundaries, the physical facilities and the master plan student enrollment for the university. The proposed project seeks to revise the current SDSU Campus Master Plan to accomplish statewide objectives of maximizing the use of the existing facilities and academic resources, while providing for the orderly growth and expansion of the campus through establishment of long-range planning, which meets the needs of the university and maintains and enhances the quality of the academic environment. See, Education Code §89080. The specific objectives of the proposed project are consistent with these state wide objectives. See, DEIR, Section 1.4, Project Objectives.

Nevertheless, CSU considers local general plans, community plans, and zoning to be of interest to each CSU campus because each campus is situated within a local community. CSU traditionally attempts to work cooperatively with local communities, and to strive for consistency with local plans and policies, whenever feasible. Thus, SDSU has voluntarily reviewed municipal plans and policies for general consistency with the SDSU 2007

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Campus Master Plan Revision project; however, none of these plans or policies govern, or have jurisdiction over, the CSU system, including SDSU.

Comment O-6-23	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
<p>The proposed Adobe Falls apartment development conflicts with the Navajo Community plan, specifically:</p> <p>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.</p> <p>Open Space Retention Objective: Which is to preserve existing open space in the community prior to development.</p> <p>Circulation Overall Objective: To provide residents with safe, ready access around as well as in and out of the community with minimal environmental damage.</p> <p>Community Environment Overall Objective: To preserve and enhance the natural beauty and amenities of the community.</p>	<p>DEIR Table 3.8-3, Navajo Community Plan Consistency Analysis, analyzes the Adobe Falls Faculty/Staff Housing component of the proposed project against the goals and objectives of the Navajo Community Plan. With respect to the Residential Element Overall Objective, the analysis determined that the proposed project is consistent with the objective because the project would support the community's goal of providing a variety of new housing types within the community, with a low-medium density of 11.2 units per acre. (DEIR p. 3.8-25.)</p> <p>With respect to the Open Space Retention Objective, the analysis determined that the proposed project is inconsistent with the objective because the proposed project would convert approximately 33 acres of SDSU-owned open space to residential land use, although it would leave approximately 16 acres as open space. (DEIR p. 3.8-25.)</p> <p>With respect to the Circulation Overall Objective, the analysis determined that the proposed project is consistent with the objective because the project would not adversely affect the safety or ready accessibility of the residents within the community. Although the proposed project would result in an increase in traffic on several streets within the Del Cerro neighborhood, these additional trips would not reduce the level of service on the affected street segments to below acceptable levels and, therefore, would not preclude the City from implementing street improvements, or the provision of safe traffic scenarios as indicated in the Navajo Community Plan. (DEIR p. 3.8-25.)</p>	
Comment O-6-24	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
<p>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 I, p. 16.)</p>	<p>The comment is incorrect. The proposed project would result in a density of 11.2 units per acre, which falls within the definition of the Navajo Community Plan "low-medium" density parameters of 10-14 units per acre. (DEIR p. 3.8-25.)</p>	
Comment O-6-25	Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007	Response
<p>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.</p>	<p>The comment is correct, the proposed Adobe Falls Faculty/Staff Housing project component conflicts with the existing City zoning. (DEIR p. 3.8-28.) However, this is not a significant impact within the meaning of CEQA because as part of the California State University system, CSU/SDSU is exempt from</p>	

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local regulations, such as the City's zoning laws and regulations under the doctrine of sovereign immunity. Please see the response to comment O6-22 for additional information responsive to the comment.

<b>Comment O-6-26</b>	<b>Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007</b>	<b>Response</b>
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.		At this time, Caltrans has not identified specific improvements to I-8 that include mainline expansion. Additionally, the site of the proposed Adobe Falls Faculty/Staff Housing lies beyond the Caltrans right-of-way.
<b>Comment O-6-27</b>	<b>Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007</b>	<b>Response</b>
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.		The EIR impact analysis determined that there is sufficient capacity on Waring Road to accommodate the additional traffic that would result with development of the Adobe Falls Faculty/Staff Housing project. With respect to the Smoketree HOA, the comment is noted and will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.
<b>Comment O-6-28</b>	<b>Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007</b>	<b>Response</b>
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.		EIR Section 5.6 addressed a number of alternate access routes to and from the proposed Adobe Falls Faculty/Staff Housing site, including a vehicle/pedestrian tunnel under I-8. (DEIR p. 5.0-36.) The analysis determined that the costs to construct the tunnel would range between \$23.4 and \$27.5 million dollars, and would add between \$159,000 and \$166,000 to the cost of each Adobe Falls housing unit. (DEIR p. 5.0-48.) The analysis determined further that the tunnel alternative does not meet the outlined development criteria and economic objectives, and would not be financially feasible. (DEIR p. 5.0-49.) The comment that the tunnel is "much more desirable to the community" than the Waring Road access will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.
<b>Comment O-6-29</b>	<b>Comments from Navajo Community Planners, Inc. (John F. Pilch), 7/26/2007</b>	<b>Response</b>
F) Properly Values and Quality of Life. The diminution in properly 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		The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.

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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.

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.

However, because the comment does not address or question the content of the Draft EIR, no further response is required.

Comment I-1-1	Comments from Stephen Chan, 6/12/2007	Response
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.		This comment provides factual background information only (i.e., a comparison of maximum units proposed under the 2005 and 2007 Campus Master Plans), and addresses a general subject area (i.e., traffic), which received extensive analysis in Section 3.14, Transportation/Circulation and Parking, of the Draft EIR. As the comment does not raise any specific issue regarding that analysis, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.
Comment I-1-2	Comments from Stephen Chan, 6/12/2007	Response
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.		<p>CSU/SDSU acknowledges the community's concerns with respect to the potential traffic impacts to the Del Cerro community that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing residential roadways without resulting in a significant impact under CEQA.</p> <p>To mitigate the proposed project's impacts at the College Avenue/Del Cerro Boulevard intersection, the Draft EIR includes Mitigation Measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the costs needed to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-102.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (DEIR p. 3.14-114.) Therefore, with implementation of this mitigation measure, impacts to this intersection would be reduced to less than significant levels.</p>

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The comment also states that the streets in the Del Cerro community were "clearly designed" for lower loads. This is not correct. The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. The correct ADT classification is 1500 ADT. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.

Finally, with respect to the safety of schoolchildren in the area of the two elementary schools, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study is to focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel school. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Comment I-1-3	Comments from Stephen Chan, 6/12/2007	Response
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.		Please see Response to Comment I1-2 for information regarding the ADT figures and roadway classifications relied upon by the Draft EIR traffic impacts analysis for the Del Cerro community's roadway network.
Comment I-1-4	Comments from Stephen Chan, 6/12/2007	Response
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		The alternatives proposed in the comment have been discussed and analyzed in Draft EIR Section 5.0, Alternatives, which discloses that SDSU undertook a thorough analysis of various alternate access routes. (DEIR pp. 5.0-33 to 5.0-49.) This alternatives analysis evaluated, among others, the costs and benefits of a route providing access via Waring Road (Alternate 1) and a route providing direct access to Interstate-8 (Alternate 5) -- both of which are

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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.

alternatives proposed in the comment. After reviewing the feasibility and environmental impacts affiliated with the five alternate access routes, the Draft EIR concludes that the only alternate access route that satisfies the project's development criteria and economic objectives is the alternate providing access to the Lower Village via the Smoketree condominium development (Alternate 1a). For that reason, the Draft EIR notes that SDSU may further investigate the potential for reaching an agreement with the condominium development providing for access.

Comment I-1-5	Comments from Stephen Chan, 6/12/2007	Response
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.	San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
Comment I-2-1	Comments from Herman H. Husbands, 6/19/2007	Response
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.	The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.	
Comment I-2-2	Comments from Herman H. Husbands, 6/19/2007	Response
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	Section 3.5, Geotechnical/Soils, of the Draft EIR evaluated project impacts associated with faulting and seismic zones. In undertaking the analysis, a review of geologic maps and literature pertaining to the general study area revealed that there are no known major or "active" faults on or in the immediate vicinity of the proposed project. (DEIR p. 3.5-6.) The Draft EIR then concludes that while ground shaking due to earthquakes on active regional faults should be expected at all sites, these impacts are not considered significant due to the project's distance from any active fault. (DEIR p. 3.5-14.) The Draft EIR nonetheless proposes adoption of Mitigation Measure GEO-1 to ensure that the project design features are in accordance with the California and Uniform Building Codes. (DEIR p. 3.5-19.) Further, there is no evidence tending to suggest that implementation of the proposed	

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to terminate any further consideration of your plan for this area (north of I-8 and west of College Avenue).

project would in any way increase the likelihood of seismic shaking and/or related hazards.

Comment I-2-3	Comments from Herman H. Husbands, 6/19/2007	Response
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 established residential area.	<p>The potential impacts to biological resources, such as wildlife and other potential endangered species, and the significance of such impacts, is extensively considered in Section 3.3, Biological Resources, of the Draft EIR. The analysis of vegetation, flora, wetlands, wildlife, and wildlife habitats incorporates a review of scientific literature and consideration of observations gathered during field reconnaissance of the proposed project site. The Draft EIR concludes that the proposed project would not result in any significant impacts to biological resources upon adoption of the proposed mitigation measures.</p> <p>Second, the comment incorrectly states that the "density of the land use in the area is far beyond what is reasonable for an established residential area." The permissible density is addressed in Section 3.8, Land Use and Planning, of the Draft EIR. The Draft EIR notes that the proposed project would result in a density of 11.2 units per acre, which is consistent with the Navajo Community Plan's "low-medium" density parameters of 10-14 units per acre. (DEIR p. 3.8-25.)</p>	
Comment I-2-4	Comments from Herman H. Husbands, 6/19/2007	Response
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.	<p>As noted in the response to comment I2-3 above, the proposed project would result in a density that is consistent with the Navajo Community Plan for the area. Moreover, there is no evidence to suggest that development of the proposed Adobe Falls Faculty/Staff Housing would have a negative effect on surrounding property values. As discussed in the Draft EIR, the proposed project would provide multi-family housing, compatible in an area that is presently surrounded by single- and multi-family dwelling units.</p>	
Comment I-2-5	Comments from Herman H. Husbands, 6/19/2007	Response
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	<p>The comment addresses general subject areas, which received extensive analysis in the Draft EIR. In Section 3.13, Public Utilities and Service Systems, the Draft EIR's analysis of the significance of potential impacts to this environmental impact category relies upon communications with applicable public service providers and reviews of available studies and other documents. The Draft EIR concludes that potential impacts to public utilities and service systems (e.g., energy; solid waste disposal; schools; libraries; emergency response plans; emergency medical services; fire protection;</p>	



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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.

police protection; parks and recreation; sewer; water demand/supply/system) would all be rendered less than significant with implementation of the proposed mitigation measures. As the comment does not raise any specific issue regarding that analysis, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.

Comment I-2-6	Comments from Herman H. Husbands, 6/19/2007	Response
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.	Please see Response to Comment I2-3 above.	
Comment I-2-7	Comments from Herman H. Husbands, 6/19/2007	Response
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.	The comment states that "SDSU should remain south of I-8 and confine any mid- to long-term plans to that area." The Draft EIR considers this alternative in Section 5.0, Alternatives. The Draft EIR describes and analyzes a range of reasonable alternatives that may also achieve the main project objectives, but would avoid or substantially lessen affiliated environmental impacts. Specifically considered in this alternatives analysis is the "No Adobe Falls Faculty/Staff Housing Alternative," under which the Adobe Falls/Faculty/Staff Housing component of the proposed project would not be master-planned and development north of I-8 would not occur. The Draft EIR concludes that this alternative is the environmentally superior alternative because it would eliminate the significant, but mitigable, impacts to biological resources, and would reduce, but not eliminate, significant and unavoidable impacts to aesthetics/visual quality, air quality and transportation/circulation. (DEIR p. 5.0-23.)	
Comment I-2-8	Comments from Herman H. Husbands, 6/19/2007	Response
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	The comment expresses an opinion. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan. However, because the comment does not raise an environmental issue associated with the content	

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compression of the facility footprint in order to provide some expansion in the near-to mid-term future.

of the Draft EIR, no further response is required.

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**Comment I-2-9****Comments from Herman H. Husbands, 6/19/2007****Response**

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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.

The comment also expresses an opinion. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan. However, because the comment does not raise an environmental issue associated with the content of the Draft EIR, no further response is required.

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**Comment I-2-10****Comments from Herman H. Husbands, 6/19/2007****Response**

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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.

This comment provides a general overview of the issues addressed throughout the comment letter, for which responses are provided above, and expresses an opinion. No further response is required as the comment's opinion does not address or question specific content of the Draft EIR. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.

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**Comment I-3-1****Comments from Robert L. Berlet, 6/20/2007****Response**

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I have reviewed the revised EIR and fail to note significant change from that offered in the 4/17/07 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.

The referenced "4/17/2007 preliminary report" was the Notice of Preparation of a Draft Environmental Impact Report ("NOP") distributed pursuant to the California Environmental Quality Act in advance of the Draft EIR. The comment is correct that there are no significant changes between the NOP and the EIR, as it should be the case. However, there are significant changes between the 2005 SDSU Campus Master Plan Revision and the 2007 project presently proposed. These changes include a substantial increase in the number of on-campus student housing beds to be built (2,976 student beds v. 600), and a decrease in the number of housing units to be built as part of the Adobe Falls Faculty Staff Housing development (348 v. 540).

The comments contained in the February 19, 2007 letter do not address the analysis presented in the Draft EIR, which was not released for public review until June 12, 2007. The letter will be included as part of the record and made available to San Diego State University and the Board of Trustees of the

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California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.

Comment I-3-2	Comments from Robert L. Berlet, 6/20/2007	Response
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.	The comment is incorrect. The Draft EIR analyzes the proposed project's potential impacts relative to traffic, noise and pollution (including, air quality and water quality), and proposes mitigation to reduce the identified significant impacts. With respect to geologic hazards, the EIR addresses the project's geotechnical/soils impacts at Section 3.5. Specific to earthquake activity, the EIR notes that Southern California is a seismically active region. Ground shaking due to earthquakes on active regional faults should be expected at all the sites, including then proposed Adobe Falls Faculty/Staff Housing site, and the shaking may impact the proposed improvements. Each of the proposed project components may potentially be impacted by seismic shaking; however, these impacts are not considered significant due to the project's distance from any active fault. (Draft EIR p. 3.5-14.)	
Comment I-3-3	Comments from Robert L. Berlet, 6/20/2007	Response
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.	<p>With respect to the reference to "shared offsite costs in the 2-39% range," under CEQA, SDSU/CSU is not required to pay more than is necessary to mitigate the identified significant impacts of the proposed 2007 Campus Master Plan Revision project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341, 361-362.) The Draft EIR calculated the SDSU/CSU fair-share percentages according to the formula used by the City of San Diego. The formula, and resulting calculations, are shown at Draft EIR pp. 3.14-108 - 110.</p> <p>With respect to the other comments, the comments address general subject areas, which received extensive analysis in the Draft EIR. The comments do not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.</p>	
Comment I-4-1	Comments from Susan Braun, 6/25/2007	Response
My husband and I have seen the revised plans in the newest draft of the EIR for	The comment incorrectly states that the density proposed for the Adobe Falls	

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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.

Faculty/Staff Housing is too high. The Draft EIR notes that the proposed project would result in a density of 11.2 units per acre, which is consistent with the Navajo Community Plan's "low-medium" density parameter of 10-14 units per acre. (DEIR p. 3.8-25.)

With regards to the traffic impacts associated with the proposed project, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadways without resulting in a significant impact under CEQA. (DEIR pp. 3.14-69 and 3.14-81; see also General Response 1, Del Cerro Roadway Classifications, for additional information regarding the existing load capacities of local streets in the Del Cerro community.)

To the extent that this comment expresses concern regarding access to the Adobe Falls Faculty/Staff Housing, the Draft EIR determined that due to the isolated location of the Lower Village, access in and out of the proposed development would be limited. Accordingly, in case of a fire or other emergency, quick evacuation from the site may be hampered by the limited access routes. This is a potentially significant impact. (DEIR p. 3.13-29.) In order to reduce this impact to a level below significant, the Draft EIR proposed Mitigation Measure PSS-6, which requires SDSU to work with the City of San Diego Fire Department to identify measures that will facilitate ingress and egress from the Lower Village prior to construction. (DEIR p. 3.13-36.)

Comment I-5-1	Comments from Mitch Younker, 6/25/2007	Response
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.	Draft EIR Section 3.10 analyzed the potential impacts of the proposed project relative to noise. The offsite traffic noise level increases attributable to the project in the College Area are presented in Draft EIR Table 3.10-5. In all cases, the increased noise levels would not result in significant impacts under CEQA and, therefore, no mitigation is required, including construction of a sound barrier. San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
Comment I-5-2	Comments from Mitch Younker, 6/25/2007	Response
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	The noise monitoring devices were properly placed. The referenced area of concern is located beyond the proposed project's noise impact influence area and, therefore, would not be impacted by increased traffic noise levels resulting from the proposed project. Because the additional traffic-related	

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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.

noise associated with the project in the Joan Court area would be acoustically minimal, any traffic noise level increase associated with the project can only be theoretically calculated and, therefore, the placement of noise monitoring devices in the area is not necessary. The noise level increase is calculated as + 0.2dB, which is beyond the accuracy limits of sound level meters and not audible to humans.

Comment I-5-3	Comments from Mitch Younker, 6/25/2007	Response
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.	Please see the response to comment I5-2, above.	
Comment I-5-4	Comments from Mitch Younker, 6/25/2007	Response
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.	The comment is noted. However, as discussed above in the response to comment I5-2, the referenced area of concern is located beyond the proposed project's noise impact influence area, including the neighborhood referenced in this comment. For these reasons, mitigation measures, including the construction of a sound barrier, are not required under CEQA.	
Please advise us on your intent and any action that will be taken surrounding these concerns.		
Comment I-6-1	Comments from Jerry and Marsha Satuloff, 6/28/2007	Response
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.	This comment expresses an opinion. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.	
Comment I-6-2	Comments from Jerry and Marsha Satuloff, 6/28/2007	Response
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!	CSU/SDSU acknowledges the commentator's opposition to the proposed project, specifically the Adobe Falls Faculty/ Staff Housing's use of alternate access through the Smoke Tree Condominium Residences. However, the commentator should note that the Smoke Tree access route for the Lower Village component of the Adobe Falls Faculty/Staff Housing was analyzed at the program level and as an alternate access route. (DEIR pp. 5.0-33 to 5.0-49.) The fact that the Draft EIR analyzed this at the program level means that additional environmental review and approval will be required before the Lower Village will be built out and/or access is secured through use of the Smoke Tree community's roads. Upon undertaking this additional environmental review, the roadway capacity of Smoke Tree's roads, the	
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.		

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western portion of Adobe Falls Road, and Waring Road will be further evaluated and the proposed project's impacts will be further assessed.

Moreover, the traffic implications of this alternate access route are subject to analysis in the Draft EIR. (DEIR pp. 3.14-88 to 3.14-90.) The Draft EIR observes that buildout of the Lower Village may result in anywhere from 600 to 2,800 average daily trips. (DEIR p. 3.14-89.) A field review of the area and a review of area maps reveal that the two roads that will need to carry the majority of project-related traffic are Adobe Falls Road (west) and Waring Road. (DEIR p. 3.14-89.) Both roads have adequate capacity to accommodate the proposed project in addition to existing traffic. (DEIR p. 3.14-90.)

Comment I-6-3	Comments from Jerry and Marsha Satuloff, 6/28/2007	Response
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. One of these options could be a viable solution, they should be investigated.	<p>The Draft EIR considers the viability of utilizing off-campus alternative locations to satisfy its expansion objectives and simultaneously avoid or substantially lessen environmental impacts. (DEIR pp. 5.0-3 to 5.0-4.) As to the Adobe Falls Faculty/Staff Housing, the Draft EIR notes that during the scoping process, community members suggested, as this comment does, that in lieu of developing the Adobe Falls site, future faculty and staff housing should be included in the redevelopment plans for the City of San Diego Grantville Redevelopment Area. However, as described in Draft EIR Section 2.0, Cumulative Projects, many of the redevelopment projects in the Grantville area are already in the planning stages and do not include or permit housing for SDSU faculty and staff. While future consideration of the Grantville area for redevelopment as faculty/staff housing may occur, that consideration would need to be provided by the City of San Diego's Redevelopment Agency, and not SDSU.</p> <p>An additional reason exists for preferring the presently proposed location -- Because CSU/SDSU has owned the Adobe Falls property since 1941, its cost basis in the property is low. The low cost basis will enable SDSU to develop housing at a relatively low cost, which can then be made available for prospective faculty and staff who might not otherwise be able to afford the standard of living in the San Diego Area. The selection of an alternative location that CSU/SDSU does not already own would eliminate this low cost basis advantage. Further, CSU/SDSU is prohibited by law from selling the Adobe Falls property; therefore neither entity can simply sell the property and purchase replacement property.</p> <p>Although the purchase of the Smoke Tree residences was not considered in</p>	

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the Draft EIR, the same problems identified in the above paragraph are applicable. Namely, purchase of the Smoke Tree residences would eliminate the low cost advantage that CSU/SDSU needs to provide affordable housing to prospective faculty and staff, and thereby achieve particular project objectives.

Comment I-6-4	Comments from Jerry and Marsha Satuloff, 6/28/2007	Response
<p>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.</p> <p>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.</p>		<p>The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not raise an environmental issue, no further response is required.</p>

Comment I-7-1	Comments from Joe Colmie, 7/9/2007	Response
<p>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.</p>		<p>CSU/SDSU acknowledges the commentator's opposition to the proposed project, specifically the Adobe Falls Faculty/ Staff Housing's use of an alternate access route through the Smoke Tree Condominium Residences. The commentator should note that the Smoke Tree access route for the Lower Village component of the Adobe Falls Faculty/Staff Housing was analyzed at the program level and as an alternate access route. (DEIR pp. 5.0-33 to 5.0-49.) The fact that the Draft EIR analyzed this at the program level means that additional environmental review and approval will be required before the Lower Village will be built out and/or access is secured through use of the Smoke Tree community's roads. Upon undertaking this additional environmental review, the roadway capacity of Smoke Tree's roads, the western portion of Adobe Falls Road, and Waring Road will be further evaluated and the proposed project's impacts will be further assessed. This analysis would also consider whether improvements to the roadways in the Smoke Tree complex would be necessary. In addition, this future project-level review would contemplate safety risks to residents of Smoke Tree, emergency vehicle access, and other potential environmental impacts affiliated with buildout of the Lower Village component of the Adobe Falls Faculty/Staff Housing. (See DEIR pp. 5.0-39 to 5.0-40 [identifying some potential impacts associated with use of Smoke Tree's roadway network for vehicular access to the Adobe Falls Faculty/Staff Housing that would be evaluated at project-level review for buildout of the Lower Village component].)</p> <p>The Draft EIR program level of review determined that buildout of the Lower Village may result in anywhere from 600 to 2,800 average daily trips. (DEIR</p>

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p. 3.14-89.) A field review of the area and a review of area maps reveal that the two roads that will need to carry the majority of project-related traffic are Adobe Falls Road (west) and Waring Road. (DEIR p. 3.14-89.) Both roads have adequate capacity to accommodate the proposed project in addition to existing traffic. (DEIR p. 3.14-90.)

<b>Comment I-7-2</b>	<b>Comments from Joe Colmie, 7/9/2007</b>	<b>Response</b>
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 use you now propose.		As set forth in the project description, the Adobe Falls Faculty/Staff Housing is designed for the exclusive use of faculty and staff. (DEIR pp. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.) Further, as required by CEQA, the environmental analysis set forth in the Draft EIR is premised on this very project description. Any amendment to this description (e.g., converting faculty/staff housing to university student housing) that would alter the environmental impact analysis may warrant further environmental review. Therefore, the Draft EIR itself provides assurances that the Adobe Falls Faculty/Staff Housing will be used only by faculty and staff.
<b>Comment I-7-3</b>	<b>Comments from Joe Colmie, 7/9/2007</b>	<b>Response</b>
Smoke Tree's roads are privately owned and maintained. It would no 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.		Please see Response to Comment I7-1 above for responsive information.
<b>Comment I-7-4</b>	<b>Comments from Joe Colmie, 7/9/2007</b>	<b>Response</b>
You are already using our property to access the Adobe Falls site. The 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 designed for, but never developed as, part use.		The comment is noted. No further response is required given that the comment does nor address or question the content of the Draft EIR. However, the comment will be made included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.
<b>Comment I-8-1</b>	<b>Comments from Roy H. Seifert, 7/7/2007</b>	<b>Response</b>
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.		The comments express the opinions of the commentator, and will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comments do not address or question the content of the Draft EIR, no further response can be provided nor is required.
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		



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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.

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 Present 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.

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**Comment I-8-2**

**Comments from Roy H. Seifert, 7/7/2007**

**Response**

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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.

San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.

Comment I-9-1	Comments from Patricia Isberg, 7/13/2007	Response
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 a 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.	<p>CSU/SDSU acknowledges the community's concerns with respect to the potential traffic impacts to the Del Cerro community that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. (DEIR pp. 3.14-69 and 3.14-81.) Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA.</p> <p>With respect to the "already congested intersection at Del Cerro Blvd. and College Avenue," the Draft EIR includes Mitigation Measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the costs needed to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-102.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (DEIR p. 3.14-114.) Therefore, with implementation of this proposed mitigation measure, the potentially significant impacts to the Del Cerro Boulevard/College Avenue intersection are reduced to a less than significant level.</p> <p>The comment also expresses an opinion suggesting that the "only solution" to alleviating traffic impacts is to provide separate access to the Adobe Falls Faculty/Staff Housing via Interstate-8. This alternate access route is among those considered in Section 5.0 of the Draft EIR. (DEIR pp. 5.0-33 to 5.0-49.) The Draft EIR concludes that this alternative is infeasible, and that the only alternate access route that satisfies the project's development criteria and economic objectives is the alternate providing access to the Lower Village via the Smoketree condominium development (Alternate 1a).</p>	
Comment I-9-2	Comments from Patricia Isberg, 7/13/2007	Response

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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.

The EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.

Comment I-9-3	Comments from Patricia Isberg, 7/13/2007	Response
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.		Please see the response to comment O4-8, Del Cerro Action Council letter dated July 27, 2007.
I hope that you will consider my concerns.		

Comment I-10-1	Comments from Martha and Russell Fuller, 7/26/2007	Response
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.		As discussed in Draft EIR Section 5.4, Institutional Alternatives, SDSU has in the past, and continues to, explore the establishment of off-campus centers in both the South Bay and East County San Diego regions. (See Draft EIR pp. 5.0-24 to 27.) Included within this effort, SDSU has been in intermittent talks with Chula Vista officials about developing a satellite campus in that city for many years. However, as discussed further in Section 5.4, it is not presently feasible from a student demand perspective and, consequently, cost perspective, to develop a South Bay alternative. Furthermore, also as discussed in Section 5.4, aside from the feasibility of establishing another university in the greater San Diego region, 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, rather than avoiding or lessening the significant impacts of the proposed project.
		With respect to off-site or on-line learning, SDSU has a long-standing commitment to the productive use of academic technologies and will continue to research applicable new technologies while analyzing their potential for

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incorporation into the academic learning environment. (See Draft EIR pp. 5.0-27 to 28.)

Comment I-10-2	Comments from Martha and Russell Fuller, 7/26/2007	Response
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.	Preliminarily, the Adobe Falls area includes single-family housing, as well as the Smoketree Condominium multi-family housing development, which is immediately adjacent to the proposed Adobe Falls Faculty/Staff Housing site. With respect to purchasing existing single-family homes for faculty/staff residences, as explained in the Draft EIR at page 5.0-4, because the State/SDSU has owned the Adobe Falls property since 1941, its cost basis in the property is low. This low cost basis provides SDSU with the opportunity to develop housing on the site at a relatively low cost, which it would then, in turn, make available to prospective faculty and staff who might otherwise not be able to afford to live in the San Diego area. The selection of an alternative location on property the State/SDSU does not already own would eliminate this low cost advantage. Furthermore, because the State/SDSU is prohibited by law from selling the Adobe Falls property, SDSU cannot simply sell the property and purchase replacement property in the immediate area.	
Comment I-10-3	Comments from Martha and Russell Fuller, 7/26/2007	Response
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.	<p>Please see the response to comment I10-2, above, regarding providing homes for faculty and staff. With respect to the comment in opposition to the proposed development of additional student housing beds on campus (Montezuma/College Avenue area), the student housing is proposed primarily in response to the community's concerns with nuisance rentals (i.e., mini-dorms). Moreover, the Montezuma/College Avenue vicinity is a mixed use area, that is compatible with the provision of student type housing.</p> <p>The comment expresses the opinions of the commentator and will be included as part of the record made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.</p>	
Comment I-10-4	Comments from Martha and Russell Fuller, 7/26/2007	Response
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	The traffic impacts associated with the proposed Campus Master Plan Revision are addressed in Draft EIR Section 3.14. The impacts analysis determined that the proposed project would result in significant traffic impacts at the intersection of Montezuma and 55th Street. (See Draft EIR pp. 3.14-74 and 78.) Mitigation measure TCP-12 requires that SDSU contribute to the City of San Diego its fair share of the costs to provide a dedicated westbound	

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are in close proximity to an elementary school (Hardy Elementary School).

right-turn lane at the 55th Street/Montezuma Road intersection. (Draft EIR p. 3.14-103.) Mitigation measure TCP-22 also requires that SDSU contribute its fair share of the costs to improve Montezuma Road between 55th Street and College Avenue to four-lane Major Arterial standards. (Draft EIR p. 3.14-106.) With implementation of the proposed mitigation, the project's potential significant impacts would be reduced to a level below significant -- the intersection would operate better under post-project conditions than it would under without project conditions. (Draft EIR p. 3.14-114.)

<b>Comment I-10-5</b>	<b>Comments from Martha and Russell Fuller, 7/26/2007</b>	<b>Response</b>
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.	The comment is noted.	
<b>Comment I-10-6</b>	<b>Comments from Martha and Russell Fuller, 7/26/2007</b>	<b>Response</b>
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. Please do not hesitate to contact us if we may provide any additional information.	San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
<b>Comment I-11-1</b>	<b>Comments from Robert G. Stewart, 7/16/2007</b>	<b>Response</b>
<p>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.</p> <p>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.</p> <p>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.</p> <p>There are no schematic typical floor plans or elevations nor information relative to building materials to be utilized.</p>	The type of information sought is unrelated to and unnecessary to conduct the necessary environmental analysis under the California Environmental Quality Act. For instance, the floor plans of the proposed residential units do not affect the environmental analysis -- that is, the interior layout of each residential unit is unrelated to the proposed project's environmental impacts. With regards to the proposed project's elevation, any potential environmental impacts relating to elevation that may result from buildout of the Upper Village are addressed in Section 3.1, Aesthetics and Visual Quality, of the Draft EIR. The Draft EIR provides a sufficient amount of detail to undertake project-level review under CEQA. (DEIR pp. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.)	
<b>Comment I-11-2</b>	<b>Comments from Robert G. Stewart, 7/16/2007</b>	<b>Response</b>
As to operations, are the units proposed to be leased or sold?	The type of property interest to be conveyed to faculty/staff has not yet been determined.	

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<b>Comment I-11-3</b>	<b>Comments from Robert G. Stewart, 7/16/2007</b>	<b>Response</b>
As to the discussions regarding "Affordable" housing, how does SDSU propose to assure that these units will be made "Affordable"?	Because the State/SDSU has owned the Adobe Falls property since 1941, its cost basis in the property is low. This low cost basis provides SDSU with the opportunity to develop housing on the site at a relatively low cost, which it would then, in turn, make available to prospective faculty and staff who might otherwise not be able to afford to live in the San Diego area. (Draft EIR p. 5.0-4.)	
<b>Comment I-11-4</b>	<b>Comments from Robert G. Stewart, 7/16/2007</b>	<b>Response</b>
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?	A housing agency will be established to oversee the sale and re-sale of the housing units. Requirements will be established that provide the housing units will stay under university control. As homeowners sell the units, they will be purchased by and resold under the Housing Agency Authority.	
<b>Comment I-11-5</b>	<b>Comments from Robert G. Stewart, 7/16/2007</b>	<b>Response</b>
Can SDSU be explicit regarding "other special markets" – i.e., Retired Faculty Housing?	As stated in the project description, the Adobe Falls Faculty/Staff Housing is proposed exclusively for faculty and staff. (DEIR p. 1.0-1.)	
<b>Comment I-11-6</b>	<b>Comments from Robert G. Stewart, 7/16/2007</b>	<b>Response</b>
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, 1.7.2.1, indicates 50 to 70 units. The Draft EIR calls for 48 units.	The comment correctly notes that the Notice of Preparation, circulated on April 17, 2007, states that 50-70 housing units were proposed at that time for buildout under the Upper Village component of the Adobe Falls Faculty/Staff Housing. However, following distribution of the Notice of Preparation, the project design for the Upper Village was revised to provide for fewer residential units, specifically 48 units. (DEIR p. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.) The reduction in the number of residential units reduces the related environmental impacts associated with this proposed project component relative to the amount noticed in the Notice of Preparation.	
<b>Comment I-11-7</b>	<b>Comments from Robert G. Stewart, 7/16/2007</b>	<b>Response</b>
The courtesy of a response, as mandated by the CEQA Guidelines, will be appreciated.	Written responses to all comments submitted on the Draft EIR will be included in the Final EIR.	
<b>Comment I-12-1</b>	<b>Comments from Rosemary Ghosn, 7/17/2007</b>	<b>Response</b>
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.	SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Draft EIR Section 3.14, Transportation/Circulation and Parking, the roadways (including Del Cerro Boulevard) have sufficient vehicle capacity to accommodate the projected	

## Responses to Comments Report

The road 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.

increase in traffic.

With respect to the referenced roadway, Del Cerro Boulevard, since the addition of proposed project traffic would not cause the level of service on Del Cerro Boulevard to fall below LOS "D," based on the City's thresholds, the proposed project would not result in a significant impact to Del Cerro Boulevard and no mitigation (i.e., street widening) is necessary..

With respect to the safety of schoolchildren in the area of the two elementary schools, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Comment I-12-2	Comments from Rosemary Ghosn, 7/17/2007	Response
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.		Please see the response to comment O4-8 submitted by the Del Cerro Action Council by letter dated July 27, 2007.
Comment I-12-3	Comments from Rosemary Ghosn, 7/17/2007	Response
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.		The commentor misunderstands the relationship between the property owned by Leonard Bloom, SDSU's property holdings, and the proposed project description. While it is true that Mr. Bloom owns property adjacent to SDSU's property, Mr. Bloom's property is part and parcel of the Upper Village component of the Adobe Falls Faculty/Staff Housing. That is, Mr. Bloom's property will be developed as part of the proposed project, and his property has been considered in undertaking the environmental review set forth in the Draft EIR. Mr. Bloom may develop his property independently, but only if the proposed project (specifically, the Upper Village) is rejected and buildout does not result. If Mr. Bloom were to develop his property at such a time, that development would be subject to CEQA review, as well.

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### Comment I-12-4

### Comments from Rosemary Ghosn, 7/17/2007

### Response

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.

The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.

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

### Comment I-13-1

### Comments from Leonard Marcus, 7/17/2007

### Response

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 804, 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.

With respect to the number of vehicle trips generated by the Lower Village component of the Adobe Falls Faculty/Staff Housing, the 1040 average daily trip ("ADT") figure identified in Figure 8-4 is a typographical error. The correct figure, and the figure upon which the Draft EIR's analysis appropriately relies, is 990 ADT. (DEIR p. 3.14-37, see Table 3.14-15A - "Horizon Year Project Trip Generation.") Therefore, the reason that the Draft EIR contains the 1040 ADT figure only once is because the use of the figure was an error. A full and thorough analysis of the impacts to the Del Cerro community's roadways is presented in the Draft EIR; and, this analysis correctly assumes that the proposed Lower Village would result in the addition of 990 ADT, which would not result in a significant impact due to adequate existing capacity. This error (i.e., the representation in Figure 8-4 that the proposed Lower Village would generate 1040 ADT) will be corrected in the Final EIR section entitled "Revised Draft EIR Pages." [Confirm with O4-3 once final.]

As to the comment's concern for the "existing uniquely sloped grade" on Adobe Falls Road and various other roads in the Del Cerro community, this factor was considered in classifying the road's capacity and subsequently analyzing project related impacts. (DEIR p. 3.14-12; see also General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.)

### Comment I-13-2

### Comments from Leonard Marcus, 7/17/2007

### Response

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

The comment incorrectly states that SDSU does not have authority to purchase property. In fact, SDSU may purchase property; it may not,



## Responses to Comments Report

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.

however, sell campus property.

To the extent that the comment expresses an opinion regarding the propriety of purchasing additional property upon which to further the campus expansion objectives, please see Section 5.0, Alternatives, of the Draft EIR for discussion relating to the consideration of off-campus alternative locations. (DEIR pp. 5.0-3 to 5.0-4.) In sum, because SDSU's cost basis in the Adobe Falls Faculty/Staff Housing property is already low (in light of its long-term ownership of the property), only the proposed site can further the project's objective to provide affordable housing for faculty and staff.

Comment I-13-3	Comments from Leonard Marcus, 7/17/2007	Response
The EIR state 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.		Please see response to comment O4-8 to the Del Cerro Action Council letter dated July 27, 2007.
**THIS TYPE OF RESTORATION WILL ATTRACT VISTORS FROM AROUND THE COUNTRY< AND IS INTENDED TO DO SO!** YET the EIR never accounts for the traffic generated by such an attraction.		
Comment I-13-4	Comments from Leonard Marcus, 7/17/2007	Response
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 700 ADT per day.		The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting ADT capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.
All of these streets are RESIDENTIAL streets and they do NOT have a LOS rating. Therefore the EIR levels which are stated are FALSE!		
Comment I-13-5	Comments from Leonard Marcus, 7/17/2007	Response
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 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 EMANUEL.		The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; an LOS exceeding "D," (i.e., LOS E) is considered by the City to be operating at deficient conditions. Therefore, at LOS C (or D) operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS D, based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.

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With respect to the comment regarding resident and schoolchildren safety in the area of the two elementary schools, the EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (Draft EIR p. 3.14-99.) In response, the EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (Draft EIR p. 3.14-107.) The Study is to focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel school. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Comment I-13-6	Comments from Leonard Marcus, 7/17/2007	Response
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, p3.14-23). Any amount of additional traffic constitutes a significant adverse impact, particularly in light of its UNIQUE location.	The Draft EIR determined that the proposed project would result in significant impacts at the Del Cerro Boulevard/College Avenue intersection. (DEIR p. 3.14-74.) To mitigate the potential impacts, the Draft EIR includes mitigation measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the funds needed to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-110.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (DEIR p. 3.14-114.) With implementation of this mitigation measure, the potential impacts to the Del Cerro Boulevard/College Avenue intersection would be reduced to less than significant.	
Comment I-13-7	Comments from Leonard Marcus, 7/17/2007	Response
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.	Mitigation measure TCP-24 requires that following occupancy of the Adobe Falls Faculty/Staff Housing Lower Village, and every six months thereafter, SDSU is to conduct traffic counts on Adobe Falls Road, Mill Peak Road, Capri Drive, Arno Drive, and Genoa Drive, to determine existing roadway average daily trips ("ADT"). At such time as the ADT generated by the Adobe Falls Faculty/Staff Housing Upper and Lower Villages reaches 80% of the total ADT forecast in the EIR, SDSU is required to institute regular shuttle service to the community to ensure project-generated ADT do not exceed the levels forecast in the EIR. (DEIR pp. 3.14-107 to 108.) Because the majority of the vehicle trips to be generated by the faculty/staff housing will be to/from the SDSU campus, it is the traffic engineer's professional judgment that a	

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reduction in traffic of 10% would occur with implementation of the shuttle, and that it is probable the reduction would actually be higher.

Therefore, the "full amount of traffic" to be generated by the project is the ADT amount reported in the analysis; following buildout of the Upper and Lower Villages, traffic levels would not exceed the levels forecast in the EIR. Significantly, however, even if the trip generation was not reduced by 10% due to operation of the shuttle as the traffic engineer forecasts, the existing roadways have sufficient available carrying capacity to handle the additional traffic such that even if the amount of project traffic were increased by 10%, each of the Del Cerro roadways would continue to operate at acceptable conditions.

Comment I-13-8	Comments from Leonard Marcus, 7/17/2007	Response
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.	<p>The comment misunderstands the relationship between the property owned by Leonard Bloom, SDSU's property holdings, and the proposed project description. While it is true that Mr. Bloom owns property adjacent to SDSU's property, as set forth and analyzed in the Draft EIR, Mr. Bloom's property is part and parcel of the Upper Village component of the Adobe Falls Faculty/Staff Housing. That is, assuming the proposed project is approved, Mr. Bloom's property will developed as part of the proposed project, and his property has been considered in undertaking the environmental review set forth in the Draft EIR. Therefore, the comment is incorrect to the extent it states that SDSU can build "another" 8 units. The full extent of development proposed for the Upper Village is 48 residential units. (Mr. Bloom may develop his property independently, but only if the proposed project (specifically, the Upper Village) is rejected and buildout does not result. If Mr. Bloom were to develop his property at such a time, that development would be subject to CEQA review, as well.)</p> <p>The comment is also incorrect to the extent it states that SDSU lacks the legal capacity and authority to purchase property. SDSU may not sell campus property; however, SDSU may acquire additional property for university uses through the appropriate channels.</p>	
Comment I-13-9	Comments from Leonard Marcus, 7/17/2007	Response
I would appreciate your acknowledgement of this letter after reading it.	The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.	
Comment I-14-1	Comments from Cathleen Kenney, 7/19/2007	Response

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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.

Draft EIR Section 3.10 analyzed the potential impacts of the proposed project relative to noise. The offsite traffic noise level increases attributable to the project in the College Area are presented in Draft EIR Table 3.10-5. In all cases, the increased noise levels would not result in significant impacts under CEQA and, therefore, no mitigation is required, including construction of a sound barrier. San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.

Comment I-14-2	Comments from Cathleen Kenney, 7/19/2007	Response
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.	<p>The noise level readings were taken in the proper locations. The referenced area of concern is located beyond the proposed project's noise impact influence area and, therefore, would not be impacted by increased traffic noise levels resulting from the proposed project. Because the additional traffic-related noise associated with the project in the Joan Court area would be acoustically minimal, any traffic noise level increase associated with the project can only be theoretically calculated and, therefore, the placement of noise monitoring devices in the area is not necessary. The noise level increase is calculated as + 0.2dB, which is beyond the accuracy limits of sound level meters and not audible to humans.</p> <p>As to the existing noise levels, Draft EIR Table 3.10-2 illustrates the existing noise levels in the Montezuma Road vicinity. At that location, existing traffic noise levels during the middle of the day are 70 dB CNEL.</p>	
Comment I-14-3	Comments from Cathleen Kenney, 7/19/2007	Response
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.	Please see the responses to comments I14-1 and I14-2, above. San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
Comment I-15-1	Comments from Toby S. Hartman, 7/15/2007	Response
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, ark 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	The comment provides background information regarding a resident's perspective of the Smoke Tree community, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to	

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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.

a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.

<b>Comment I-15-2</b>	<b>Comments from Toby S. Hartman, 7/15/2007</b>	<b>Response</b>
<p>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:</p> <p>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.</p>		<p>As set forth in the project description, the Adobe Falls Faculty/Staff Housing is designed for the exclusive use of faculty and staff. (DEIR pp. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.) Further, as required by CEQA, the environmental analysis set forth in the Draft EIR is premised on this very project description. Any amendment to this description (e.g., converting faculty/staff housing to university student housing) that would alter the environmental impact analysis may warrant further environmental review. Therefore, the Draft EIR itself already provides assurances that the Adobe Falls Faculty/Staff Housing will be used only by faculty and staff.</p>
<b>Comment I-15-3</b>	<b>Comments from Toby S. Hartman, 7/15/2007</b>	<b>Response</b>
<p>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 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 have already been very disconcerting.</p>		<p>The Draft EIR analyzed whether selection of an alternative access route through the Smoke Tree residences would result in significant noise impacts. (DEIR p. 3.10-15.) Under this alternate access scenario, the proposed project would add up to 2,800 average daily trips to Adobe Falls Road. This additional traffic would increase the noise level by approximately two dB CNEL. This two dB CNEL increase is not considered to be a substantial increase in the ambient noise levels; therefore, the project would not result in significant noise impacts to off-site Adobe Falls Road uses due to the increased traffic volumes.</p>
<b>Comment I-15-4</b>	<b>Comments from Toby S. Hartman, 7/15/2007</b>	<b>Response</b>
<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,</p>		<p>CSU/SDSU acknowledges the commentator's opposition to the proposed project, specifically the Adobe Falls Faculty/ Staff Housing's use of an alternate access route through the Smoke Tree Condominium Residences. The commentator should note that the Smoke Tree access route for the Lower Village component of the Adobe Falls Faculty/Staff Housing was analyzed at the program level and as an alternate access route. (DEIR pp.</p>

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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.

5.0-33 to 5.0-49.) The fact that the Draft EIR analyzed this at the program level means that additional environmental review and approval will be required before the Lower Village will be built out and/or access is secured through use of the Smoke Tree community's roads. Upon undertaking this additional environmental review, the roadway capacity of Smoke Tree's roads, the western portion of Adobe Falls Road, and Waring Road will be further evaluated and the proposed project's impacts will be further assessed. In addition, this future project-level review would contemplate safety risks to residents of Smoke Tree, emergency vehicle access, and other potential environmental impacts affiliated with buildout of the Lower Village component of the Adobe Falls Faculty/Staff Housing. (See DEIR pp. 5.0-39 to 5.0-40 [identifying potential impacts associated with use of Smoke Tree's roadway network for vehicular access to the Adobe Falls Faculty/Staff Housing].)

The commentator should also note that the traffic implications of this alternate access route were assessed in the Draft EIR. (DEIR pp. 3.14-88 to 3.14-90.) The Draft EIR observes that buildout of the Lower Village may result in anywhere from 600 to 2,800 average daily trips. (DEIR p. 3.14-89.) A field review of the area and a review of area maps reveal that the two roads that will need to carry the majority of project-related traffic are Adobe Falls Road (west) and Waring Road. (DEIR p. 3.14-89.) Both roads have adequate capacity to accommodate the proposed project in addition to existing traffic. (DEIR p. 3.14-90.)

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### Comment I-15-5

### Comments from Toby S. Hartman, 7/15/2007

### Response

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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.

The Draft EIR considers the impacts of the alternate access route for the Adobe Falls Faculty/Staff Housing through the Smoke Tree residences to the western segment of Adobe Falls Road. The Draft EIR determined that the proposed project would not result in significant impacts to this roadway. (DEIR pp. 3.14-89 to 3.14-90.) However, the Draft EIR also notes that a potentially significant impact may occur at the Adobe Falls Road/Waring Road intersection if proper intersection geometrics are not provided. (DEIR p. 3.14-90.) To ensure that this potential impact is less than significant, the Draft EIR recommends the adoption of Mitigation Measure TCP-26, which requires SDSU to conduct a peak-hour intersection analysis at the Adobe Falls Road/Waring Road intersection during project-specific review of the Lower Village component of the Adobe Falls Faculty/Staff Housing. (DEIR p. 3.14-108.)

Please see Response to Comment I15-4, above, for additional responsive information.

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### Comment I-15-6

### Comments from Toby S. Hartman, 7/15/2007

### Response

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.

The "100+ unit building" referenced in the comment was considered in the Draft EIR as a related project. This project is the William Lyons Homes - Grantville project. (DEIR p. 2.0-4.) As provided in the Draft EIR, the traffic impacts analysis considered the cumulative traffic impacts associated with pending (such as the William Lyons Home - Grantville project) and probable future projects both in the near-term and horizon year analysis. (DEIR p. 3.14-99.)

As to any potential impact on emergency services, as discussed in Draft EIR Section 3.14, the Adobe Falls Faculty/Staff Housing's alternate access route would not result in significant impacts relating to traffic and, therefore, the additional traffic associated with the proposed project would not result in a significant impact to emergency medical service access. (DEIR p. 3.14-98.) Additionally, as discussed in Draft EIR Section 3.13, Public Utilities and Services Systems, emergency response vehicles have the right-of-way and are exempted from rules of the road in emergency situations. Therefore, any surrounding traffic that would be on the roadways must yield the right-of-way and immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and stop until the emergency vehicle has passed. (DEIR pp. 3.13-28 to 3.13-29.) Accordingly, the proposed project would not significantly impact the provision of emergency services to residents of the Del Cerro community.

Please see Response to Comments I15-4 and I15-5, above, for additional responsive information.

### Comment I-15-7

### Comments from Toby S. Hartman, 7/15/2007

### Response

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 done 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.

Under the California Supreme Court's ruling in *City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal.4th 341, SDSU/CSU's power to mitigate the effects of the project is ultimately subject to legislative control; if the Legislature does not appropriate the funds necessary to mitigate the significant impacts of the project to the jurisdictional agency, then CSU does not have the power to mitigate the project's effects. (39 Cal.4th at 367.) Therefore, as the Draft EIR notes in the Transportation/Circulation and Parking section, SDSU's fair-share funding commitment towards the identified roadway improvements is necessarily conditioned upon 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. (DEIR

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p. 3.14-117.) However, the law does not require that SDSU abandon the project, or parts of the project, in the event the Legislature denies funding of the identified roadway mitigation. Please see General Response 3, City of Marina Compliance, for additional information responsive to this comment. The comment that development of the proposed project should not proceed without appropriate funding to mitigate the traffic impacts of the project will be included as part of the record and made available to SDSU and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.

<b>Comment I-15-8</b>	<b>Comments from Toby S. Hartman, 7/15/2007</b>	<b>Response</b>
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?		The Draft EIR studies various alternate routes that could be used to access the proposed Adobe Falls Faculty/Staff Housing in place of the proposed College Avenue/ Del Cerro Boulevard Access. (DEIR p. 5.0-39.) In fact, five conceptual alternate access routes and related sub-routes were considered. Three of those alternatives are alternatives proposed by the comment: (i) vehicle/pedestrian tunnel under the freeway (Alternate 3); (ii) vehicle/pedestrian bridge over the freeway (Alternate 4); and (iii) direct freeway access. (DEIR pp. 5.0-36 to 5.0-37.) Potential environmental impacts associated with each of these alternatives was considered in the Draft EIR. (DEIR pp. 5.0-43 to 5.0-47.) However, these alternatives do not satisfy the project's objectives as they are cost prohibitive and would preclude SDSU from being able to offer faculty and staff affordable housing in the campus region. (DEIR p. 5.0-49.)
<b>Comment I-15-9</b>	<b>Comments from Toby S. Hartman, 7/15/2007</b>	<b>Response</b>
4. ENVIRONMENT: Hummingbird nesting as well as well known and documented plants and other birds like the gnatcatcher. Air quality reduction from the major 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.		The comment addresses general subject areas, which received extensive analysis in the Draft EIR. (See Section 3.2, Air Quality; Section 3.3, Biological Resources; and Section 3.13, Public Utilities and Services Systems.) The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.
<b>Comment I-15-10</b>	<b>Comments from Toby S. Hartman, 7/15/2007</b>	<b>Response</b>
5. ROADS: Increased car usage breaking down a road built for much less traffic, breakdowns of cars on narrow roads impeding traffic and safety		The Draft EIR analyzed the potential impacts associated with the Smoke Tree alternate access route at a project level of review. If the alternate access route is selected, additional environmental review is required prior to



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approval. Please see the response to comment I15-4, above, for additional information responsive to the comment.

<b>Comment I-15-11</b>	<b>Comments from Toby S. Hartman, 7/15/2007</b>	<b>Response</b>
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?	The Draft EIR analyzed the potential impacts associated with the Smoke Tree alternate access route at a project level of review. If the alternate access route is selected, additional environmental review is required prior to approval. Please see the response to comment I15-4, above, for additional information responsive to the comment.	
<b>Comment I-15-12</b>	<b>Comments from Toby S. Hartman, 7/15/2007</b>	<b>Response</b>
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?	The Draft EIR notes that the Alvarado Creek flows through the proposed site for the Adobe Falls Faculty/Staff Housing, generally from east to west, entering the site via a culvert at the southeastern end, and exiting at the northwest end via a manmade concrete channel -- this northwest exit is near the Smoke Tree residences. (DEIR p. 3.7-10.) The Draft EIR further provides that development of the Adobe Falls Faculty/Staff Housing site would reduce infiltration as a result of an increase in impervious surfaces in presently undeveloped areas that either drain to Alvarado Creek or naturally percolate into the soil. The increase in runoff volumes for each storm event represents a potentially significant impact. (DEIR p. 3.7-16.) In response, the Draft EIR includes Mitigation Measure HWQ-2, which requires SDSU to conduct a detailed site-specific hydrologic analysis of the proposed site in order to further assess the effects of the proposed project on the flood plain and, based on that analysis, determine whether on-site detention facilities are needed. This hydrologic analysis would occur prior to the preparation of final design plans for the Adobe Falls Faculty/Staff Housing. (DEIR p. 3.7-29.)	
<b>Comment I-15-13</b>	<b>Comments from Toby S. Hartman, 7/15/2007</b>	<b>Response</b>
7. CRIME: Increased traffic, density, and openness will bring increased crime to our already difficult situation from the west end of Adobe Falls Road.	The Draft EIR addresses the proposed project's impact on police services. (DEIR pp. 3.13-25 to 3.13-26.) The Draft EIR notes that the addition of campus community members will necessitate additional policing staff, which would constitute a potentially significant impact. Accordingly, the Draft EIR recommends the adoption of Mitigation Measure PSS-3, which would require SDSU's Department of Public Safety to take steps necessary to increase police staff, equipment, and facilities, at levels necessary to serve the increased campus population and maintain the existing response rate of three to five minutes for 90% of its calls. These steps would need to be taken in conjunction with the preparation of site-specific design plans for the 2007 Campus Master Plan revision project. (DEIR p. 3.13-36.) With	

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implementation of Mitigation Measure PSS-3, the potential impact to police services would be reduced to a less than significant level.

Comment I-15-14	Comments from Toby S. Hartman, 7/15/2007	Response
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.	The Draft EIR notes that the proposed project would generate additional demand for sewer services, and that this may be a potentially significant impact. (DEIR p. 3.13-24.) In order to lessen this potentially significant impact, the Draft EIR recommends adoption of Mitigation Measure PSS-1, which would require SDSU to consult with the City of San Diego's Development Services Department, Water Review, on exact sizing and extensions required for water and sewer lines that will serve each project component as it moves forward with site-specific design plans. (DEIR p. 3.13-35.)	
Comment I-15-15	Comments from Toby S. Hartman, 7/15/2007	Response
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?	The demand for the faculty/staff housing proposed is discussed in Section 1.0, Project Description, of the Draft EIR. (DEIR pp. 1.0-25 to 1.0-27.) In order to accommodate the anticipated 10,000 full-time equivalent student ("FTES") growth, SDSU must hire approximately 691 additional faculty and 591 additional staff members over the years, through 2024-2025. The Draft EIR notes that CSU has adopted a report addressing the serious constraints CSU will face in recruiting and retaining a faculty of high quality during the coming decade due, in part, to excessive California housing costs. In light of the high cost of housing in San Diego County, coupled with the relatively low salaries earned by SDSU faculty, CSU/SDSU has determined that it is necessary to assist faculty and staff with obtaining affordable housing that is centrally located to the campus -- such assistance will presumably enable CSU/SDSU to recruit qualified faculty and staff. Therefore, at this time, there is no evidence that there will be inadequate demand for the proposed faculty/staff housing; as a result, SDSU has not considered any alternate uses for the proposed Adobe Falls Faculty/Staff Housing.	
Comment I-15-16	Comments from Toby S. Hartman,	Response
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.	Please see Response to Comment I15-13 above.	
Comment I-15-17	Comments from Toby S. Hartman,	Response

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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.

The proposed Adobe Falls Faculty/Staff Housing would be consistent with the single- and multi-family residences in the surrounding area. Additionally, the proposed project would result in a density of 11.2 units per acre, which is consistent with the Navajo Community Plan's "low-medium" density parameter of 10-14 units per acre. (DEIR p. 3.8-25.)

### Comment I-15-18

### Comments from Toby S. Hartman,

### Response

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.

San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.

### Comment I-16-1

### Comments from Armin and Rhea Kuhlman, 7/16/2007

### Response

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.

Draft EIR Project Description Section 1.0, Project Description, addresses the demographic projections that provide the basis for the proposed increase in full-time equivalent students at Section 1.3.2. As discussed in that section, based on demographic projections provided by the California Department of Finance and California State University academic planning, student enrollment at the post-secondary level throughout California is expected to increase substantially over the next several years. This growth is expected at the state and regional level, as well as at the local level. SANDAG projections of overall population growth in the County are instructive, but population growth generally is not directly related to forecasting the demand for future higher education. The most recent SANDAG population growth statistics for San Diego County are relevant to the EIR analysis of population and housing impacts provided in EIR Section 3.12. Section 3.12 utilizes SANDAG's most recent update of population projections, as contained in the 2030 Regional Growth Forecast (September 2006).

### Comment I-16-2

### Comments from Armin and Rhea Kuhlman, 7/16/2007

### Response

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

CSU/SDSU student enrollment forecasts are based on numerous factors, including annual enrollment applications and matriculated students. For Fall 2006, SDSU received 52,384 applications, with 28,170 students admitted, and 9,043 enrolling. In comparison, for Fall 2007, SDSU received 58,099 applications, with 29,262 students admitted, and 9,500 projected to enroll. Therefore, even under the "backup insurance" scenario to which the comment refers, the increasing number of enrollees confirms the increasing demand.

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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%.

<b>Comment I-16-3</b>	<b>Comments from Armin and Rhea Kuhlman, 7/16/2007</b>	<b>Response</b>
	<p>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, 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' 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.</p>	<p>Please see the response to comment I16-1 above. As noted, general population trends are not indicative necessarily of higher education demand trends.</p>
<b>Comment I-16-4</b>	<b>Comments from Armin and Rhea Kuhlman, 7/16/2007</b>	<b>Response</b>
	<p>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.</p>	<p>San Diego State University is a state university, funded by the State of California and charged with responding to student enrollment demand throughout the State of California. The same is true of all CSU universities.</p> <p>As for how annual enrollment increases are determined, the overriding variable used to determine annual enrollment growth percentages is the ability of each campus to enroll additional students in order to respond to statewide enrollment demand. Related to that consideration is the fact that there is an expectation that each campus take its fair share of additional students. Of course, there is also a fine tuning process in which adjustments are made to accommodate campuses that want to grow faster than the CSU systemwide average growth percentage rate, and similarly, adjustments made for campuses that have been losing enrollment over the past several years.</p>
<b>Comment I-16-5</b>	<b>Comments from Armin and Rhea Kuhlman, 7/16/2007</b>	<b>Response</b>
	<p>2. Disregard for Location of Projected Population Growth Within San Diego County. Attention should be given to the areas in which San Diego population</p>	<p>As the SDSU campus rapidly approaches enrollment capacity, on-going efforts have been and will continue to be undertaken to review and evaluate</p>

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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 361,11 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 Gove (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.

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 Temecula 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?

the use of off-campus centers. However, there are numerous factors to consider in determining the adoption of an alternative sites model. SDSU Academic policy states that Off-Campus Centers should be guided by specific academic principles. Of overriding importance is the requirement that all academic programs should be as comparable as possible with programs on the main campus, remaining in conformity with the University's overall mission and rigorously adhering to the long-standing teacher-scholar model that distinguishes SDSU. The following mission statement provides a broad framework for determining the viability of off-campus sites:

"The general goals of any San Diego State University off-campus site should be consistent with the University's educational mission. Any such site should complement or add value to the University's programs. Baccalaureate, graduate, post-baccalaureate, certificate, and/or continuing education programs located in these sites should reflect the high academic expectations of the institution and provide access to higher education for diverse communities.

An off-campus site should develop educational goals and academic programs specific to the needs of the region and, where appropriate, local communities. A site should provide the intellectual and physical environment to maximize educational opportunities, consistent with individual and community interests and needs. Collaboration with other higher education institutions, governmental entities, and interested businesses/industries should be considered. In addition to traditional core academic programs, an off-campus site may provide education through field placement, clinical experience, and/or faculty/student research opportunities, using a broad spectrum of learning modalities."

Additionally, as discussed in Draft EIR Section 5.4, Institutional Alternatives, SDSU has in the past, and continues to, explore the establishment of off-campus centers in both the South Bay and East County San Diego regions. Included within this effort, SDSU has been in intermittent talks with Chula Vista officials about developing a satellite campus in that city for many years. However, as discussed further in Section 5.4, it is not presently feasible from a student demand perspective and, consequently, cost perspective, to develop a South Bay alternative. Furthermore, also as discussed in Section 5.4, aside from the feasibility of establishing another university in the greater San Diego region, 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, rather than avoiding or lessening the significant impacts of the proposed project."

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As in the past, when opportunity is presented and/or when enrollment demand demonstrates the need to provide off-site instruction and remote facilities, SDSU will make every effort to respond to the call.

Comment I-16-6	Comments from Armin and Rhea Kuhlman, 7/16/2007	Response
<p>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.</p> <p>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.</p> <p>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.</p>	<p>Please see response to comment I16-5, above.</p>	
Comment I-16-7	Comments from Armin and Rhea Kuhlman, 7/16/2007	Response
<p>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.</p>	<p>The Draft EIR lays out the rationale for a finding of less than significant impact to housing within the College Area Community (DEIR, p. 3.12-15 – 19). As indicated in Table 3.12-9 (DEIR, p. 3.12-16), a total of 4,942 beds are currently available to SDSU students through on campus housing or off campus housing that is managed by SDSU for the sole purpose of SDSU student use. In addition, through apartment complex owner interviews, SDSU estimates that approximately 90% of off campus housing units (that are within 0.5 mile of campus or that are serviced by a shuttle to/from SDSU), are occupied by SDSU students (approximately 3,336 students). There are</p>	

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another 1,983 multi-family housing units within 0.5 to 1.0 mile of campus that are also likely SDSU residences, however SDSU has not assumed that any students live in these units in an effort to present a conservative estimate of the number of students living within 1.0 mile of school. Therefore, SDSU knows that there are approximately 8,278 multi-family residential student beds on campus, off campus within SDSU managed housing, within 0.5 mile of campus or in multi-family residential complexes that provide a shuttle service to/from SDSU. Approximately 31 – 33% of existing students live within the units described above.

SDSU has estimated, that upon project build-out, on campus housing, off campus housing managed by SDSU, multi-family residential housing units within 1.0 mile of campus and housing units that provide shuttle service to SDSU, there will be a total of 11,919 beds potentially available to future students. This would result in on campus or off campus multi-family housing for approximately 50% of future students. SDSU believes that provision of housing for 50% of the ultimate student body population within the College Area Community (either on or off campus) or along trolley routes is adequate because of two main reasons. 1) SDSU students are quite often sensitive to price. As stated in the Draft EIR (DEIR, p. 3.12-19), based on existing SDSU student residence distribution patterns, as well as price considerations expressed in housing preference surveys, not all SDSU students will have the means to live away from home. A large percentage of SDSU's students are from San Diego County cities or communities; many of these students chose to commute to SDSU rather than move nearby; 2) Some students have and will continue to chose to live along major transportation routes (i.e., I-8/Mission Valley, I-15/Serra Mesa) or in the beach communities due to convenience, unit preference and presence of amenities. It is unlikely that these housing preferences will drastically change over the build-out of the EIR.

Comment I-16-8	Comments from Armin and Rhea Kuhlman, 7/16/2007	Response
<p>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).</p> <p>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.</p>		<p>Section 5.4 of the Draft EIR outlines off-campus facilities that could support an expanded SDSU enrollment. As indicated in Section 5.4.1, SDSU has participated in the development of off-campus facilities, most notably the Imperial Valley Campus and the San Marcos Campus, the later of which now operates as a stand alone university within the CSU system (DEIR, p. 5.0-24). In addition to construction of off campus facilities, SDSU has offered classes at two additional off-campus sites in San Diego County – National City/Southwestern College and Miramar College. SDSU chose to close the National City campus for several reasons: 1) financial – a financial analysis determined that for the small percentage of students that were taking courses</p>

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at the National City campus, the cost per class that SDSU incurred to provide these courses was prohibitive (DEIR, p. 5.0-25). 2) traffic reduction – SDSU found that 57% of the students that were taking classes at the National City Campus had addresses outside of the south county area, this was resulting in more traffic than previously anticipated (DEIR, p. 5.0-25); 3) main campus traffic reduction – It was found that 89.4% of the students that registered for SDSU courses at the National City center took most of their courses on SDSU's main campus. When surveyed, students indicated that they would continue to travel to the main SDSU campus for the use of library resources, health facilities, social environments, etc (DEIR, p. 5.0-25). It was determined that the state's higher education resources could be better utilized by providing enhanced and expanded resources on the main campus versus continuing to support this satellite facility (DEIR, p. 5.0-25). The Draft EIR further states that similar issues were experienced at the Miramar College satellite facility and ultimately, this facility was closed in June 2004 (DEIR, p. 5.0-26-27). The Draft EIR has indicated that as enrollment demand demonstrates a need to provide off-site instruction and remote facilities, SDSU will make every effort to respond to such a demand. In summary, given existing budgetary considerations, past demand of such off-site facilities and ability for off-site facilities to fully mitigate the need to visit the main SDSU campus for other auxiliary services, SDSU has determined that development of future off-site facilities is not the most efficient means to meet projected demand.

Comment I-16-9	Comments from Armin and Rhea Kuhlman, 7/16/2007	Response
SANDAG population projections are utilized to “prove” that the proposed enrollment increase is “consistent with growth forecasts for the area.” This is tautological reasoning 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’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.”	SDSU met with SANDAG during the summer of 2005 to discuss projected student enrollment increases at SDSU’s main campus. SDSU was asked to forward current student projections to SANDAG because SDSU growth projections were not previously incorporated into SANDAG’s projections; projections were forwarded to SANDAG on October 6, 2005 (see Appendix M to the DEIR, specifically Appendix A to the Population and Housing Technical Report). SANDAG released updated 2030 Growth Forecasts in September 2006. All projected growth figures outlined in the DEIR (i.e., Tables 3.12-1, 3.12-2, 3.12-3, 3.12-4 and 3.12-7), utilize the September 2006 SANDAG 2030 Growth Forecasts. SDSU agrees with the commentator that the September 2006 2030 projections do incorporate the anticipated growth of the university.  Because the growth forecasts are used to determine each jurisdiction’s share of the region’s housing needs, an accurate assessment of the growth anticipated at major regional facilities, such as universities, is an imperative component of accurate housing unit forecasts. Based on these forecasts, the	



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local jurisdictions, including the City of San Diego, analyze projected increases in population at regional facilities and determine how their city's land use patterns (and associated residential densities) should be modified to adequately provide for future housing units.

Comment I-16-10	Comments from Armin and Rhea Kuhlman, 7/16/2007	Response
<p>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%).</p>	<p>As to the comment citing Draft EIR Section 3.2.5.2, the comment does not outline a deficiency or concern related to the EIR but rather restates a statement in the Draft EIR, and, therefore, no response is necessary.</p>	<p>The commentor is correct in stating that the 2004 Brailsford and Dunlavey Report did not specify the type of housing unit within each zip code, rather, the zip code tabulation was related to student status (freshman, sophomore, etc.) and average price paid per room. In an attempt to determine the existing residency patterns of SDSU students in multi-family residential units within the College Area Community, SDSU Office of Facilities Planning Design and Construction staff conducted door-to-door interviews with apartment complex managers within approximately 1.0 mile of campus during the winter and spring of 2007 to determine the percentage of units occupied by SDSU students. The information obtained through this survey effort was an attempt to provide an updated and more detailed estimate of SDSU multi-family residential patterns within the College Area Community and was summarized in Table 3.12-9 (DEIR, p. 3.12-16).</p>
<p>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.</p>	<p>While the commentor is correct that the 2004 Brailsford and Dunlavey Report did not provide a summary of students currently living in single family residences (either as a renter or homeowner), the Draft EIR provides substantial discussion about the negative indirect effects of several students renting rooms or portions of rooms within single family homes (i.e., nuisance rentals or "mini dorms"). Section 3.12.5.2.1.1 (DEIR, p. 3.12-20) describes the mini dorm problem (i.e., noise from increased densities of students in residential communities, increased traffic and parking demands, and the general compatibility of student versus neighborhood land use demands). The discussion in the Draft EIR further outlines the fact that mini dorm control involves not only SDSU and SDSU Police, but the City of San Diego, through local law enforcement and land use and entitlement regulation. The Draft EIR discusses several existing zoning code and municipal ordinance regulations, conflict negotiation processes, special community tasks forces and SDSU programs that have been ongoing in an effort to curb the increase in mini dorms. These programs and efforts are ongoing and will continue to be regardless of the status of this EIR and the proposed Master Plan Revision.</p>	
<p>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.</p>		

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SDSU agrees with the commentor that the 33% of the existing student body figure living within the SDSU area is likely an underestimate. That said, the conclusion that this underestimate therefore means that a significant portion of students are living in single family homes (i.e., mini dorms) within the College Area Community can not be made. For example, in the 2004 Brailsford & Dunlavey Study, of the students who live off-campus, 45% rent an apartment, 24% live with their parents or relatives, 14% rent a house, 9% own their own home and 4% rent a room in a private home. This study does not specify the specific location of those individuals who indicated they rent a house or rent a room in a private home. While it is likely to assume a portion of these residents are located within the College Area Community and may live in mini dorms, it is not accurate to assume that this entire subset is within the area immediately surrounding SDSU.

CEQA requires that a project be analyzed to determine if its introduction will induce substantial growth within the area. Within Section 3.12, this question is framed in the context of whether the project will induce substantial population growth which would result in a shortfall of housing. The analysis outlined in Section 3.12.5.2 describes the number of multi-family housing units that SDSU can reasonably project (through its own actions or those of others, including private apartment developers, based on local General Plan or Redevelopment Plan densities), within the College Area Community and other nearby communities where students traditionally live. This survey indicated that between on campus housing, off campus housing managed by SDSU and privately owned/operated housing within 1.0 mile of campus or along trolley routes, units to support 50% of the future student headcount will be available. Based on the 2004 Brailsford & Dunlavey data (the most current, comprehensive database of known student housing distribution), 33% of students live either on campus or within the 92115 zip code (i.e., nearby SDSU). Further, because the 2004 Brailsford & Dunlavey survey indicated that 45% of off-campus student residents live in an apartment complex, it was reasonable to assume that a similar, high percentage of apartment complex residency would occur in the future, therefore the focus on multi-family residential units within the surrounding area and along trolley routes. Please also see General Response 2, Population and Housing Related Matters.

Comment I-16-11	Comments from Armin and Rhea Kuhlman, 7/16/2007	Response
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	Estimates as to the remaining life span of the College Area Community's multi-family housing stock would be speculative at best. While SDSU does agree with the commentor that it is reasonable to assume that existing apartment	

## Responses to Comments Report

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 uncounted students living in this housing into other housing in the College area, most likely the single family housing. This would create a significant impact.

complexes may be demolished within the build-out period of the master plan, pure economic realities that originate from the underlying land use designation and zoning (i.e., multi-family residential), would support the conclusion that rebuilt units would be of similar, if not higher, in density compared to their existing counterparts. As indicated in the SANDAG 2030 Growth Forecasts, as of 2004 (the most recent year for which SANDAG provides data), the San Diego Region's vacancy rate is 4.3%. As a general rule of practice, if a region's vacancy rate is less than 5%, this signifies that there is a housing shortage. Because the region has and is projected to continue to face an overall housing shortage and the population of SDSU students is projected to increase, market incentives will likely encourage private multi-family development within the San Diego region, and specifically within the College Area Community and other communities typically favored by SDSU students.

The assumption that condo conversions within the College Area Community will replace existing units that are available for rent to SDSU students is speculative. While condo conversions do often result in replacement of renters with home owners, it can not be assumed that all condo conversion projects would result in such activity. Further, many SDSU students own their own homes, therefore condo conversions have likely and may continue to be desirable to the home-owning student population especially those within the College Area Community. Finally, it is difficult to predict the condo conversion activity that would likely occur in the future within the College Area Community as this type of development activity often follows regional housing and real estate cycles.

Comment I-16-12	Comments from Armin and Rhea Kuhlman, 7/16/2007	Response
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.	SDSU, along with private multi-family housing developers, understands that there is an existing demand for additional student housing options within the College Area Community. This demand is not only related to a growing SDSU student body but also the housing affordability issues that are facing the entire San Diego Region. For this reason, SDSU is proposing the master plan revision. Further, private multi-family housing unit developers have and will continue to process projects within the College Area Redevelopment Plan Area and surrounding areas in response to student housing demand. Finally, SDSU does not have the ability to add additional housing units without processing a master plan revision (as the existing master plan of record does not provide for additional housing units on campus beyond those already constructed). Given the growth of the SDSU student body that is occurring on an annual basis, preparation of a master plan solely focused on housing without regard to future (and currently ongoing) growth would be short-sighted.	

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Comment I-16-13

Comments from Armin and Rhea Kuhlman, 7/16/2007

Response

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.

The commentor is correct in stating that SDSU is projecting that the percentage of off-campus, privately owned/operated housing units that would make up the 50% of units on or within 1.0 mile of campus by project build-out is higher compared to the existing percentage of off-campus, privately owned/operated housing units that make up the 33% of units on or within 1.0 mile of campus. This discrepancy is likely due to the fact that in an abundance of caution, (due to lack of reliable student housing distribution data), SDSU has not assumed any students live within privately owned/operated multi-family housing units between 0.5 and 1.0 mile of campus (that do not have shuttle service to/from SDSU). However, in actuality, it is reasonable to assume that a portion of these off campus, privately owned/operated multi-family residential properties do house SDSU students and therefore the 33% number is likely an underestimate.

The justification for assuming that the privately owned/operated multi-family residential market in and around the university will provide a larger percentage of the student housing units compared to the existing condition is twofold. First, the City of San Diego is currently finalizing preparation of the General Plan Update which focuses on the "City of Villages" concept. The SDSU/College Area has been described as one of the City's "villages." The village concept is predicated on the ability to build transit oriented development around a commercial and economic core (as made possible by the trolley extension into the SDSU area in July 2005). The General Plan, which is the vision for future land use patterns throughout the City, is assuming that the College Community will increase in density to support not only SDSU students but other commercial and economic opportunities that would likely materialize in this transforming urban node in the future. Second, and closely related, is the College Area Community Redevelopment Plan which calls for redevelopment of several key areas around SDSU. The Redevelopment Plan is another City-sponsored effort to increase density around the university in support of a more vibrant economic node. Because the City's past and ongoing planning efforts (i.e., General Plan Update-city of Villages and College Area Community Redevelopment Plan) coupled by regional planning efforts (i.e., extension of the trolley into the SDSU area) are highly likely to result in an increase of multi-family residential units within the College Area Community, an increase in the percentage of privately owned/operated housing units to support approximately 50% of students within the SDSU area is justified.

Comment I-16-14

Comments from Armin and Rhea Kuhlman, 7/16/2007

Response

## Responses to Comments Report

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.

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 solution to the rise of nuisance rentals ("mini-dorms") in the College Area Community is multi-faceted. Development of additional multi-family housing units in the College Area Community and along transit routes will help provide additional options for students and, through the effects of a free market economy, may help increase competition and therefore reduce the price of available units. The City of San Diego, through local land use and zoning controls, has helped curb the flow of students utilizing single family homes as mini-dorms. In July 2007, the City of San Diego City Council voted in favor to amend the Land Development Code to restrict the number of bedrooms in single family residential neighborhoods, limit the width of driveways and clarify the requirements for garage conversions (City of San Diego, City Council Meeting Minutes, July 9, 2007). Further, a proposed "rooming house" ordinance is planned for hearing by the City Council in the Fall of 2007. This ordinance would restrict commercial lease activity of single family homes to multiple lease-holders in specific single family residential neighborhoods of the City. The City of San Diego Police Department has and continues to be instrumental in reducing the negative impacts of mini-dorms. A six-month pilot program instituted by the City of San Diego Police Department and City's Neighborhood Code Compliance Division has resulted in issuance of 30 \$1,000 citations as of early August 2007 (San Diego Union Tribune, August 5, 2007). Further, the City Council and San Diego Police Department continue to and have increased support/enforcement of the Community Assisted Party Program (CAPP) which provides a mechanism to combat chronic party houses (City of San Diego, City Council Meeting Minutes, July 9, 2007). SDSU-sponsored on-campus housing development will assist in providing students with close and convenient living choices. All of the above efforts constitute important components of the multi-faceted issue of mini-dorms. Because it is highly likely that all or many of these efforts will help curb the amount of, and negative community effects of mini-dorms, it can not be assumed that a single factor, the increase of SDSU students, has a direct correlation with an increase in mini-dorms within the College Area Community.

Please also see the response to comment I16-10, above.

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### Comment I-16-15

### Comments from Armin and Rhea Kuhlman, 7/16/2007

### Response

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

The referenced student housing financing feasibility report is still being prepared and is not yet complete. A substantial amount of work remains to be done on the report, and SDSU anticipates that it will be completed sometime around the end of the year. SDSU has discussed preliminary information regarding the report with the report's authors, and the report contains no significant new information that would alter the conclusions reached in the

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EIR prior to the release of the updated study.

Draft EIR. It is not necessary to extend the Draft EIR comment period.

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.

Comment I-16-16

Comments from Armin and Rhea Kuhlman, 7/16/2007

Response

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.

The students that will live between .5 miles and 2.0 miles from campus are considered commuter students or "non-resident students" for purposes of the traffic impact analysis. Their numbers are considered as part of the traffic impacts analysis presented in Draft EIR Section 3.14. (See, Draft EIR Tables 3.14-14A and 3.14-15A.)

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.

Comment I-16-17

Comments from Armin and Rhea Kuhlman, 7/16/2007

Response

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

The projections of future trolley ridership are based on SANDAG projections, as explained at Draft EIR pp. 3.14-33 to 34. With respect to incentive programs, during the first year of trolley operations, SDSU and Metropolitan Transit Service ("MTS") initiated a subsidized "College Pass" which is sold

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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 trolley or bus, carpooling and shuttles from outlying parking areas such as Qualcomm stadium discussed?

during the first month of the semester. SDSU pays a \$20.00 subsidy to each rider making the price of a transit pass approximately \$113 per semester. Additionally, alternative transportation programs promoted and information provided on the University's Parking and Transportation website include:

- ☐ Bus and trolley information with links to schedules;
- ☐ Tips on using alternative traffic routes and parking in areas of campus that are less congested;
- ☐ SDSU's "School Pool", a rideshare program which is free to all students, faculty and staff. Those interested, whether they drive or not, can apply online at [www.ridelink.com](http://www.ridelink.com) and are paired with other SDSU commuters who live nearby;
- ☐ "Park and Pedal" information on nearby areas from which students, staff, and faculty can easily ride to campus; and,
- ☐ Additional information on the campus' Red and Black shuttle, Campus Escort Services, and location of resources such as the parking information booth.

Comment I-16-18	Comments from Armin and Rhea Kuhlman, 7/16/2007	Response
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. This glaring omission needs to be addressed.	Consistent with The San Diego Traffic Engineers' Council ("SANTEC") Guidelines for conducting traffic studies in the San Diego Region, the Draft EIR traffic impacts analysis study area includes all roadway segments to which the project would add 50 peak hour trips or more.	
Comment I-16-19	Comments from Armin and Rhea Kuhlman,	Response
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 that SDSU's current neighborhood, with respect to traffic impacts.	Please see the response to comment I16-5, above.	
Comment I-16-20	Comments from Armin and Rhea Kuhlman, 7/16/2007	Response
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.	The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.	
Comment I-16-21	Comments from Armin and Rhea Kuhlman, 7/16/2007	Response
The Mitigation Measures assume that SDSU will be able to secure funding from	Under the California Supreme Court's ruling in <i>City of Marina v. Board of</i>	

## Responses to Comments Report

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.

Trustees of the California State University (2006) 39 Cal.4th 341, SDSU/CSU's power to mitigate the effects of the project is ultimately subject to legislative control; if the Legislature does not appropriate the funds necessary to mitigate the significant impacts of the project to the jurisdictional agency, then CSU does not have the power to mitigate the project's effects. (39 Cal.4th at 367.) Therefore, as the Draft EIR notes in the Transportation/Circulation and Parking section, SDSU's fair-share funding commitment towards the identified roadway improvements is necessarily conditioned upon 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. (Draft EIR p. 3.14-117.) Please see General Response 3, City of Marina Compliance, for additional information responsive to this comment.

San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.

Comment I-16-22	Comments from Armin and Rhea Kuhlman, 7/16/2007	Response
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 70th 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		Please see the response to comment I16-5, above, and I16-23, below.
Comment I-16-23	Comments from Armin and Rhea Kuhlman, 7/16/2007	Response
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.		Draft EIR Section 5.5 (pages 5.0-3 - 4) addresses the subject of off-campus alternative locations. As explained in Section 5.2.2, "[b]ecause 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 for the development of academic facilities to accommodate the increase in FTES would not meet one of the primary objectives of the project. Additionally, as discussed in [Draft EIR] Section 5.4, Institutional Alternatives, SDSU has in the past, and continues to, explore the establishment of off-campus centers in both the South Bay and East County San Diego regions. Included within this effort, SDSU has been in intermittent



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talks with Chula Vista officials about developing a satellite campus in that city for many years. However, as discussed further in Section 5.4, it is not presently feasible from a student demand perspective and, consequently, cost perspective, to develop a South Bay alternative. Furthermore, also as discussed in Section 5.4, aside from the feasibility of establishing another university in the greater San Diego region, 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, rather than avoiding or lessening the significant impacts of the proposed project." Section 5.2.2 also addresses the Qualcomm Stadium site, and alternative locations for the Adobe Falls Faculty/Staff Housing project component.

<b>Comment I-16-24</b>	<b>Comments from Armin and Rhea Kuhlman, 7/16/2007</b>	<b>Response</b>
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.	Please see the response to comment I16-5.	
<b>Comment I-16-25</b>	<b>Comments from Armin and Rhea Kuhlman, 7/16/2007</b>	<b>Response</b>
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.	San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
<b>Comment I-16-26</b>	<b>Comments from Armin and Rhea Kuhlman, 7/16/2007</b>	<b>Response</b>
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.	Please see the response to comment I16-4, above.	
<b>Comment I-16-27</b>	<b>Comments from Armin and Rhea Kuhlman, 7/16/2007</b>	<b>Response</b>

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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.

San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.

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**Comment I-17-1****Comments from Paul and Joyce Pepper Bragoli, 7/20/2007****Response**

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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.

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 1040 average daily trip ("ADT") figure identified in Figure 8-4 is a typographical error. The correct figure is 990 ADT. (DEIR p. 3.14-37.) The 990 ADT represents the number of daily vehicle trips that would be generated by the Adobe Falls Faculty/Staff Housing Lower Village, and was calculated by multiplying the number of Lower Village units that would be built under the Del Cerro access scenario (124) times x 8 ADT per dwelling unit = 992, rounded off to the nearest tens digit. (Draft EIR Table 3.14-15A.) A full and thorough analysis, relying on the 990 ADT figure, of the impacts to the Del Cerro community's roadways is presented in the Draft EIR, and this analysis concludes that the impact would be less than significant due to adequate existing roadway capacity. This error (i.e., the representation in Figure 8-4 that the proposed Lower Village would generate 1040 ADT) will be corrected in the Final EIR section entitled "Revised Draft EIR Pages."

As to the comment's concern for the relationship between the "extremely pitched slope" on Adobe Falls Road and traffic impacts, this factor was considered in classifying the road's capacity and subsequently analyzing project related impacts. (DEIR p. 3.14-12; see also General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.) Additionally, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) Although the focus of the study will be on the vicinity of the elementary schools near the Del Cerro Boulevard/College Avenue intersection, the area of the Adobe Falls Road grade can be addressed as well. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

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**Comment I-17-2****Comments from Paul and Joyce Pepper Bragoli, 7/20/2007****Response**

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## Responses to Comments Report

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.

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 EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.

<b>Comment I-17-3</b>	<b>Comments from Paul and Joyce Pepper Bragoli, 7/20/2007</b>	<b>Response</b>
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.	The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR. However, the comment will be made included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.	
<b>Comment I-17-4</b>	<b>Comments from Paul and Joyce Pepper Bragoli, 7/20/2007</b>	<b>Response</b>
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.	There is no evidence to suggest that development of the proposed Adobe Falls Faculty/Staff Housing would have a negative effect on surrounding property values. As discussed in the Draft EIR, the proposed project would provide multi-family housing in an area that is presently surrounded by single- and multi-family dwelling units.	
Response expected from SDSU: Acknowledgement of the negative impact this project has on local real estate owner investments.		
<b>Comment I-18-1</b>	<b>Comments from Timothy G. Todd, 7/20/2007</b>	<b>Response</b>
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 comment incorrectly states that the Draft EIR "does not take into account the nature of Mill Peak Road and Adobe Falls Road." In preparing the traffic analysis and determining the classification of impacted roadways, various factors (e.g., curb-to-curb width of the roadway; rights-of-way; the design speed; the maximum grade; the minimum curve radii; fronting land uses) were considered pursuant to San Diego's City Street Design Manuals. (DEIR p. 3.14-12.)	
• 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		

## Responses to Comments Report

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 years 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 100 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.

Additionally, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) Although the focus of the study will be on the vicinity of the elementary schools near the Del Cerro Boulevard/College Avenue intersection, the area of the Adobe Falls Road grade can be addressed as well. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Finally, with regards to the opinion that Mill Peak and Adobe Falls Road were "never designed for such a traffic load," the Del Cerro roadway classifications utilized in the Draft EIR's traffic impact analysis, and resulting ADT capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. These roads are equipped to handle the ADT generated by the proposed project in conjunction with existing use levels. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.

Comment I-18-2	Comments from Timothy G. Todd, 7/20/2007	Response
<ul style="list-style-type: none"><li>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.</li></ul>		<p>Preliminarily, restoration of the Adobe Falls, and the development of any trails on the Adobe Falls site, would not occur until development of the Lower Village. (See, e.g., Final EIR Mitigation Measure CR-4.) The Lower Village will be developed over the long-term, sometime beyond the year 2012, with no commencement date presently planned. (Draft EIR p. 1.0-36.) Accordingly, the Lower Village site was analyzed in the EIR at the program level of review, and development of the site will undergo additional CEQA analysis prior to project construction. During subsequent development phases, the Lower Village trail system will be designed, and any/all impacts associated with the trails will be assessed. However, it is presently contemplated that the trails to be developed on the Adobe Falls Lower Village site will be developed for use by the residents of the Adobe Falls Faculty/Staff Housing community, not for use by the general public. Therefore, with resident use of the trails, no additional vehicle trips would be generated. Moreover, even if the trails were available for public use, any vehicle traffic generated would be relatively</p>

## Responses to Comments Report

minimal.

Comment I-18-3	Comments from Timothy G. Todd, 7/20/2007	Response
<ul style="list-style-type: none"> <li>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.</li> </ul>	<p>Section 3.0, Biological Resources, of the Draft EIR analyzes the proposed project's impact on sensitive wildlife species, including the Least Bell's Vireo and coastal California gnatcatcher. (See Table 3.3-3, Sensitive Wildlife Species Present or Potentially Present on the Adobe Falls Faculty/Staff Housing Site [noting federal or state special status species; identifying primary habitat; and assessing likelihood of species to be found on site].) The Draft EIR concludes that with adoption of the proposed mitigation measures, impacts to such sensitive biological resources would be less than significant. (DEIR pp. 3.3-75 to 3.3-79.)</p> <p>As to the comment's identification of the "tree" fox, this is just another name for the gray fox. This species is not a designated special status species under either state or federal law. In fact, the gray fox is well adapted to urbanization. While the gray fox may be present within the proposed project's open space areas, the biologists who undertook field studies for the 2005 and 2007 Campus Master Plan Revision projects did not come across any indicators that the gray fox is present on site and concluded that there was a low potential they exist on site.</p>	
Comment I-18-4	Comments from Timothy G. Todd, 7/20/2007	Response
<ul style="list-style-type: none"> <li>The level of service ratings described in the EIR for Adobe Falls Road and surrounding streets are erroneous. We understand that our residential street 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.</li> </ul>	<p>The EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.</p> <p>Please see Response to Comment I18-1, which discusses the manner in which roadways in the Del Cerro community were classified.</p>	
Comment I-18-5	Comments from Timothy G. Todd, 7/20/2007	Response

## Responses to Comments Report

- 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.

The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; an LOS exceeding "D," (i.e., LOS E) is considered by the City to be operating at deficient conditions. Therefore, at LOS C (or D) operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS D, based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.

With respect to the comment regarding resident and schoolchildren safety in the area of the two elementary schools, the EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (Draft EIR p. 3.14-99.) In response, the EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (Draft EIR p. 3.14-107.) The Study is to focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel school. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

With regards to construction-related traffic impacts, the Draft EIR proposes adoption of Mitigation Measures TCP-25 and TCP 26 to reduce potentially significant impacts to less than significant levels. (DEIR p. 3.14-108.)

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### Comment I-18-6

### Comments from Timothy G. Todd, 7/20/2007

### Response

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- 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 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.

To mitigate the proposed project's impacts at the College Avenue/Del Cerro Boulevard intersection, the Draft EIR includes mitigation measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the costs to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-102.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (See DEIR p. 3.14-114.)

With respect to the comment that no consideration is given to the left turn lane from College Avenue to Del Cerro Boulevard, the comment is incorrect; all

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four turning movements at the intersection were considered as part of the traffic impacts analysis. See, e.g., Draft EIR Figure 10-2, Inset No. 6.

Comment I-18-7	Comments from Timothy G. Todd, 7/20/2007	Response
<ul style="list-style-type: none"> <li>The nature of traffic reduction achieved by the proposed shuttle is speculative and has not been fully documented or address.</li> </ul>	<p>Mitigation measure TCP-24 requires that following occupancy of the Adobe Falls Faculty/Staff Housing Lower Village, and every six months thereafter, SDSU is to conduct traffic counts on Adobe Falls Road, Mill Peak Road, Capri Drive, Arno Drive, and Genoa Drive, to determine existing roadway average daily trips ("ADT"). At such time as the ADT generated by the Adobe Falls Faculty/Staff Housing Upper and Lower Villages reaches 80% of the total ADT forecast in the EIR, SDSU is required to institute regular shuttle service to the community to ensure project-generated ADT do not exceed the levels forecast in the EIR. (DEIR pp. 3.14-107 to 108.) Because the majority of the vehicle trips to be generated by the faculty/staff housing will be to/from the SDSU campus, it is the traffic engineer's professional judgment that a reduction in traffic of 10% would occur with implementation of the shuttle, and that it is probable the reduction would actually be higher.</p> <p>Therefore, the "full amount of traffic" to be generated by the project is the ADT amount reported in the analysis; following buildout of the Upper and Lower Villages, traffic levels would not exceed the levels forecast in the EIR. Significantly, however, even if the trip generation was not reduced by 10% due to operation of the shuttle as the traffic engineer forecasts, the existing roadways have sufficient available carrying capacity to handle the additional traffic such that even if the amount of project traffic were increased by 10%, each of the Del Cerro roadways would continue to operate at acceptable conditions.</p>	

Comment I-18-8	Comments from Timothy G. Todd,	Response
<p>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</p>	<p>The comment expresses an opinion regarding access routes to the Adobe Falls Faculty/Staff Housing. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.</p>	

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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.

Comment I-18-9	Comments from Timothy G. Todd, 7/20/2007	Response
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 costs 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.	The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not raise an environmental issue, no further response is required.	

Comment I-18-10	Comments from Timothy G. Todd,	Response
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.	The comment addresses general subject areas, which received extensive analysis in the Draft EIR. (See Section 3.13, Public Utilities and Service Systems; Section 3.14, Transportation/Circulation and Parking.) The comment does not raise any specific issue(s) regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.	

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



## Responses to Comments Report

Comment I-19-1	Comments from Ann Gottschalk, 7/20/2007	Response
<p>After reading the Draft EIR, I have the following concerns regarding the Faculty/Staff Housing proposed in Adobe Falls.</p> <p>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.</p>	<p>As set forth in the project description, the Adobe Falls Faculty/Staff Housing is designed for the exclusive use of faculty and staff. (DEIR pp. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.) Further, as required by CEQA, the environmental analysis set forth in the Draft EIR is premised on this very project description. Any amendment to this description (e.g., converting faculty/staff housing to university student housing) that would alter the environmental impact analysis may warrant further environmental review. Therefore, the Draft EIR itself already provides assurances that the Adobe Falls Faculty/Staff Housing will be used only by faculty and staff.</p>	
Comment I-19-2	Comments from Ann Gottschalk, 7/20/2007	Response
<p>As far as accessing Smoke Tree's private driveways in the second phase, I am opposed to that notion for the following reasons:</p> <p>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.</p> <p>Our fire lanes are privately funded and we simply cannot afford to repave more often than we already do for our own traffic needs.</p>	<p>CSU/SDSU acknowledges the commentator's opposition to the proposed project, specifically the Adobe Falls Faculty/ Staff Housing's use of alternate access through the Smoke Tree Condominium Residences. However, the commentator should note that the Smoke Tree access route for the Lower Village component of the Adobe Falls Faculty/Staff Housing was analyzed at the program level and as an alternate access route. (DEIR pp. 5.0-33 to 5.0-49.) The fact that the Draft EIR analyzed this at the program level means that additional environmental review and approval will be required before the Lower Village will be built out and/or access is secured through use of the Smoke Tree community's roads. Upon undertaking this additional environmental review, the roadway capacity of Smoke Tree's roads, the western portion of Adobe Falls Road, and Waring Road will be further evaluated and the proposed project's impacts will be further assessed.</p> <p>The Draft EIR observes that buildout of the Lower Village may result in anywhere from 600 to 2,800 average daily trips. (DEIR p. 3.14-89.) A field review of the area and a review of area maps reveal that the two roads that will need to carry the majority of project-related traffic are Adobe Falls Road (west) and Waring Road. (DEIR p. 3.14-89.) Both roads have adequate capacity to accommodate the proposed project in addition to existing traffic. (DEIR p. 3.14-90.)</p>	
Comment I-19-3	Comments from Ann Gottschalk, 7/20/2007	Response
<p>I also disagree that the western side of Adobe Falls Road can handle 6,500 ADT's 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</p>	<p>The western segment of Adobe Falls Road is classified as a 2-lane collector roadway pursuant to the City of San Diego's Street Design Manual. Therefore, the total roadway capacity is 6,500 average daily trips ("ADT"). An existing traffic count was conducted on this western segment of Adobe Falls Road, which revealed an existing ADT count of 3,690. Therefore, the</p>	

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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.

segment can accommodate approximately an additional 2,800 ADT and still operate at an acceptable level of service. Since the proposed project is estimated to only add a maximum of 2,800 ADT to this segment of Adobe Falls Road, the impact would be less than significant. (DEIR pp. 3.14-89 to 3.14-90.)

With regards to the "Levanto condominium project," this related project was considered in the cumulative impacts analysis. At some point during the development process, the Levanto condominium project changed names and became known as the William Lyons Homes - Grantville project. (DEIR p. 2.0-4.) As provided in the Draft EIR, the traffic impacts analysis considered the cumulative traffic impacts associated with pending (such as the William Lyons Home - Grantville project) and probable future projects both in the near-term and horizon year analysis. (DEIR p. 3.14-99.)

The other project referenced in the comment appears to be the 36-unit Waring Gardens Apartment expansion project, located at 5320-5340 Adobe Falls Road. This project, according to City of San Diego staff, is presently "on hold." In the event that this expansion project goes forward, any additional vehicle trips that may be generated along Adobe Falls Road, which would presumably be relatively limited given the small size of the expansion project, would be accounted for in the project-level traffic impact analysis for the Lower Village component of the Adobe Falls Faculty/Staff Housing.

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### Comment I-19-4

### Comments from Ann Gottschalk, 7/20/2007

### Response

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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.

As previously discussed in Response to Comment I19-2, above, in the event the Smoke Tree alternate access route is selected for further consideration, additional environmental review will be conducted with respect to all impact categories, including air quality and aesthetics.

With regards to the potential for visual quality deterioration, the Draft EIR notes that, depending on the location of the access route through the Smoke Tree residences, construction may result in large retaining walls and concrete structures, which may result in visual impacts. (DEIR pp. 5.0-39 to 5.0-40.) These potential visual impacts will be studied in greater detail when project level review is undertaken for the Lower Village component of the Adobe Falls Faculty/Staff Housing. The comment's concern for air quality deterioration is also noted; however, construction related emissions (e.g., those that would result from building a bridge over the flood control channels) are not analyzed until project level review.

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## Responses to Comments Report

### Comment I-19-5

### Comments from Ann Gottschalk, 7/20/2007

### Response

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.

The Draft EIR notes that the Alvarado Creek flows through the proposed site for the Adobe Falls Faculty/Staff Housing, generally from east to west, entering the site via a culvert at the southeastern end, and exiting at the northwest end via a manmade concrete channel -- this northwest exit is near the Smoke Tree residences. (DEIR p. 3.7-10.) The Draft EIR further provides that development of the Adobe Falls Faculty/Staff Housing site would reduce infiltration as a result of an increase in impervious surfaces in presently undeveloped areas that either drain to Alvarado Creek or naturally percolate into the soil. The increase in runoff volumes for each storm event represents a potentially significant impact. (DEIR p. 3.7-16.) In response, the Draft EIR includes Mitigation Measure HWQ-2, which requires SDSU to conduct a detailed site-specific hydrologic analysis of the proposed site in order to further assess the effects of the proposed project on the flood plain and, based on that analysis, determine whether on-site detention facilities are needed. This hydrologic analysis would need to occur prior to the preparation of final design plans for the Adobe Falls Faculty/Staff Housing. (DEIR p. 3.7-29.)

### Comment I-20-1

### Comments from Carol R. Kushner, 7/20/2007

### Response

As a Del Cerro resident and community member, I wish to express several objections to the Environmental Impact Report (EIR) for the 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.

The Del Cerro roadway classifications utilized in the EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.

### Comment I-20-2

### Comments from Carol R. Kushner, 7/20/2007

### Response

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.

The EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT

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This constitutes a significant adverse impact to local residents, pedestrians, and bicyclists.

provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.

With respect to the comment that the impacts analysis be based on the project's percentage increase in traffic, please see response to comment O4-2 submitted by the Del Cerro Action Council by letter dated July 27, 2007.

Comment I-20-3	Comments from Carol R. Kushner, 7/20/2007	Response
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.	<p>The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; an LOS exceeding "D," (i.e., LOS E) is considered by the City to be operating at deficient conditions. Therefore, at LOS C (or D) operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS D, based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.</p> <p>With respect to the comment regarding resident and schoolchildren safety in the area of the two elementary schools, the EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (Draft EIR p. 3.14-99.) In response, the EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (Draft EIR p. 3.14-107.) The Study is to focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel school. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.</p>	
Comment I-20-4	Comments from Carol R. Kushner, 7/20/2007	Response
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	Mitigation measure TCP-24 requires that following occupancy of the Adobe Falls Faculty/Staff Housing Lower Village, and every six months thereafter, SDSU is to conduct traffic counts on Adobe Falls Road, Mill Peak Road, Capri Drive, Arno Drive, and Genoa Drive, to determine existing roadway average daily trips ("ADT"). At such time as the ADT generated by the Adobe Falls	

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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.

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

Faculty/Staff Housing Upper and Lower Villages reaches 80% of the total ADT forecast in the EIR, SDSU is required to institute regular shuttle service to the community to ensure project-generated ADT do not exceed the levels forecast in the EIR. (DEIR pp. 3.14-107 to 108.) Because the majority of the vehicle trips to be generated by the faculty/staff housing will be to/from the SDSU campus, it is the traffic engineer's professional judgment that a reduction in traffic of 10% would occur with implementation of the shuttle, and that it is probable the reduction would actually be higher.

Therefore, the "full amount of traffic" to be generated by the project is the ADT amount reported in the analysis; following buildout of the Upper and Lower Villages, traffic levels would not exceed the levels forecast in the EIR. Significantly, however, even if the trip generation was not reduced by 10% due to operation of the shuttle as the traffic engineer forecasts, the existing roadways have sufficient available carrying capacity to handle the additional traffic such that even if the amount of project traffic were increased by 10%, each of the Del Cerro roadways would continue to operate at acceptable conditions.

Comment I-21-1	Comments from Patricia Toomey Ross, 7/24/2007	Response
<p>After reading the Draft EIR, I have the following concerns regarding the Faculty/Staff Housing proposed in Adobe Falls.</p> <p>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.</p>		<p>As set forth in the project description, the Adobe Falls Faculty/Staff Housing is designed for the exclusive use of faculty and staff. (DEIR pp. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.) Further, as required by CEQA, the environmental analysis set forth in the Draft EIR is premised on this very project description. Any amendment to this description (e.g., converting faculty/staff housing to university student housing) that would alter the environmental impact analysis may warrant further environmental review. Therefore, the Draft EIR itself already provides assurances that the Adobe Falls Faculty/Staff Housing will be used only by faculty and staff.</p>
Comment I-21-2	Comments from Patricia Toomey Ross, 7/24/2007	Response
<p>As far as accessing Smoke Tree's private driveways in the second phase, I am opposed to that notion for the following reasons:</p> <p>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</p>		<p>CSU/SDSU acknowledges the commentator's opposition to the proposed project, specifically the Adobe Falls Faculty/ Staff Housing's use of alternate access through the Smoke Tree Condominium Residences. However, the commentator should note that the Smoke Tree access route for the Lower Village component of the Adobe Falls Faculty/Staff Housing was analyzed at the program level and as an alternate access route. (DEIR pp. 5.0-33 to 5.0-49.) The fact that the Draft EIR analyzed this at the program level means that additional environmental review and approval will be required before the Lower Village will be built out and/or access is secured through use of the Smoke Tree community's roads. Upon undertaking this additional</p>

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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.

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

environmental review, the roadway capacity of Smoke Tree's roads, the western portion of Adobe Falls Road, and Waring Road will be further evaluated and the proposed project's impacts will be further assessed.

The Draft EIR observes that buildout of the Lower Village may result in anywhere from 600 to 2,800 average daily trips. (DEIR p. 3.14-89.) A field review of the area and a review of area maps reveal that the two roads that will need to carry the majority of project-related traffic are Adobe Falls Road (west) and Waring Road. (DEIR p. 3.14-89.) Both roads have adequate capacity to accommodate the proposed project in addition to existing traffic. (DEIR p. 3.14-90.)

Comment I-21-3	Comments from Patricia Toomey Ross, 7/24/2007	Response
I also disagree that the western side of Adobe Falls Road can handle 6,500 ADT's 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.	<p>The western segment of Adobe Falls Road is classified as a 2-lane collector roadway pursuant to the City of San Diego's Street Design Manual. Therefore, the total roadway capacity is 6,500 average daily trips ("ADT"). An existing traffic count was conducted on this western segment of Adobe Falls Road, which revealed an existing ADT count of 3,690. Therefore, the segment can accommodate approximately an additional 2,800 ADT and still operate at an acceptable level of service. Since the proposed project is estimated to only add a maximum of 2,800 ADT to this segment of Adobe Falls Road, the impact would be less than significant. (DEIR pp. 3.14-89 to 3.14-90.)</p> <p>With regards to the "Levanto condominium project," this related project was considered in the cumulative impacts analysis. At some point during the development process, the Levanto condominium project changed names and became known as the William Lyons Homes - Grantville project. (DEIR p. 2.0-4.) As provided in the Draft EIR, the traffic impacts analysis considered the cumulative traffic impacts associated with pending (such as the William Lyons Home - Grantville project) and probable future projects both in the near-term and horizon year analysis. (DEIR p. 3.14-99.)</p> <p>The other project referenced in the comment appears to be the 36-unit Waring Gardens Apartment expansion project, located at 5320-5340 Adobe Falls Road. This project, according to City of San Diego staff, is presently "on hold." In the event that this expansion project goes forward, any additional vehicle trips that may be generated along Adobe Falls Road, which would presumably be relatively limited given the small size of the expansion project, would be accounted for in the project-level traffic impact analysis for the Lower Village component of the Adobe Falls Faculty/Staff Housing.</p>	

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Comment I-21-4	Comments from Patricia Toomey Ross, 7/24/2007	Response
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.	<p>As previously discussed in Response to Comment I19-2, above, in the event the Smoke Tree alternate access route is selected for further consideration, additional environmental review will be conducted with respect to all impact categories, including air quality and aesthetics.</p> <p>With regards to the potential for visual quality deterioration, the Draft EIR notes that, depending on the location of the access route through the Smoke Tree residences, construction may result in large retaining walls and concrete structures, which may result in visual impacts. (DEIR pp. 5.0-39 to 5.0-40.) These potential visual impacts will be studied in greater detail when project level review is undertaken for the Lower Village component of the Adobe Falls Faculty/Staff Housing. The comment's concern for air quality deterioration is also noted; however, construction related emissions (e.g., those that would result from building a bridge over the flood control channels) are not analyzed until project level review.</p>	
Comment I-21-5	Comments from Patricia Toomey Ross, 7/24/2007	Response
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.	<p>The Draft EIR notes that the Alvarado Creek flows through the proposed site for the Adobe Falls Faculty/Staff Housing, generally from east to west, entering the site via a culvert at the southeastern end, and exiting at the northwest end via a manmade concrete channel -- this northwest exit is near the Smoke Tree residences. (DEIR p. 3.7-10.) The Draft EIR further provides that development of the Adobe Falls Faculty/Staff Housing site would reduce infiltration as a result of an increase in impervious surfaces in presently undeveloped areas that either drain to Alvarado Creek or naturally percolate into the soil. The increase in runoff volumes for each storm event represents a potentially significant impact. (DEIR p. 3.7-16.) In response, the Draft EIR includes Mitigation Measure HWQ-2, which requires SDSU to conduct a detailed site-specific hydrologic analysis of the proposed site in order to further assess the effects of the proposed project on the flood plain and, based on that analysis, determine whether on-site detention facilities are needed. This hydrologic analysis would need to occur prior to the preparation of final design plans for the Adobe Falls Faculty/Staff Housing. (DEIR p. 3.7-29.)</p>	
Comment I-22-1	Comments from Morton and Naomi Hirshman, 7/18/2007	Response
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	<p>Section 3.14, Transportation/Circulation and Planning, of the Draft EIR assesses the potential impacts of the proposed project on the local transportation and circulation system. The existing traffic volumes in the Del</p>	

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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.

Cerro community are not presently operating at full capacity. (DEIR p. 3.14-26.) Further, upon buildout of the proposed project, the Del Cerro community's roadway network would still have adequate capacity. (DEIR pp. 3.14-69 and 3.14-81.) Therefore, the proposed project would result in a less than significant impact.

The propriety of securing off campus alternative locations for SDSU expansion is considered in Section 5.0, Alternatives, of the Draft EIR. (DEIR pp. 5.4-24 to 5.0-30.) The Draft EIR notes that SDSU has developed and will continue to develop off campus centers, the use of academic technology, and summer term enrollment in an effort to serve the increasing student demand for higher education in locations other than the SDSU main San Diego campus. However, the Draft EIR concludes that reliance on these alternatives will not enable SDSU to meet the projected future student enrollment demands.

Comment I-23-1	Comments from Susan Thomas, 7/20/2007	Response
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 show 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.	The comment is an introduction to comments that follow. No further response is required.	
Comment I-23-2	Comments from Susan Thomas, 7/20/2007	Response
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	The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. The Draft EIR provides a detailed description of the basis for the roadway classification at pp. 3.14-11 to 3.14-13. Please also see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.	



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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 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.

Comment I-23-3	Comments from Susan Thomas, 7/20/2007	Response
<p>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.</p> <p>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..</p> <p>Therefore, I request that SDSU conduct an impact analysis for all residential streets where potential traffic increases are more than 100%.</p>	<p>With respect to the percentage increases in traffic and whether there are significant impacts, please see response O4-2 to the Del Cerro Action Council letter, dated July 27, 2007.</p> <p>With respect to the comment regarding resident and schoolchildren safety, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.</p>	

Comment I-23-4	Comments from Susan Thomas, 7/20/2007	Response
<p>TIII. 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.</p> <p>Therefore, SDSU must include an analysis of the potential traffic impacts generated by non-residential public to/from both Adobe Falls housing developments.</p>	<p>Preliminarily, restoration of the Adobe Falls, and the development of any trails on the Adobe Falls site, would not occur until development of the Lower Village. (See, e.g., Final EIR Mitigation Measure CR-4.) The Lower Village will be developed over the long-term, sometime beyond the year 2012, with no commencement date presently planned. (Draft EIR p. 1.0-36.) Accordingly, the Lower Village site was analyzed in the EIR at the program level of review, and development of the site will undergo additional CEQA analysis prior to project construction. During subsequent development phases, the Lower Village trail system will be designed, and any/all impacts associated with the trails will be assessed. However, it is presently contemplated that the trails to be developed on the Adobe Falls Lower Village site will be developed for use</p>	

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by the residents of the Adobe Falls Faculty/Staff Housing community, not for use by the general public. Therefore, with resident use of the trails, no additional vehicle trips would be generated. Moreover, even if the trails were available for public use, any vehicle traffic generated would be relatively minimal.

Comment I-23-5	Comments from Susan Thomas, 7/20/2007	Response
<p>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.</p> <p>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 pond on paper, but they must be effective from a practical sense.</p>	<p>The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; an LOS exceeding "D," (i.e., LOS E) is considered by the City to be operating at deficient conditions. Therefore, at LOS C (or D) operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS D, based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.</p> <p>Please see Response to Comment I23-3, above, for information regarding the safety impacts on schools and the Draft EIR's proposed mitigation.</p>	
Comment I-23-6	Comments from Susan Thomas, 7/20/2007	Response
<p>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.</p> <p>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 provide results, before being able to use shuttle service a mitigating factor.</p>	<p>The comment is incorrect. The Draft EIR's traffic impact analysis refers to the institution of shuttle service and the corresponding impact reductions only within the context of traffic generated by the Adobe Falls Faculty/Staff Housing -- the Draft EIR does not claim that shuttle service "will significantly reduce traffic generated by the entire Master Plan project." Mitigation Measure TCP-24 proposes implementation of the shuttle service following buildout of the Upper and Lower Villages, and at such time as the ADT generated by this project component reaches 80% of the total ADT forecast in the Draft EIR. (DEIR pp. 3.14-107 to 3.14-108.) Because the majority of the vehicle trips to be generated by this housing component will be to/from the SDSU campus, it is the traffic engineer's professional judgment that a 10% reduction in traffic would occur with implementation of the shuttle, and that it is probable the reduction would actually be higher.</p>	
Comment I-23-7	Comments from Susan Thomas, 7/20/2007	Response

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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.

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.

The demand for the faculty/staff housing proposed is discussed in Section 1.0, Project Description, of the Draft EIR. (DEIR pp. 1.0-25 to 1.0-27.) In order to accommodate the anticipated 10,000 full-time equivalent student (“FTES”) growth, SDSU must hire approximately 691 additional faculty and 591 additional staff members over the years, through 2024-2025. The Draft EIR notes that CSU has adopted a report addressing the serious constraints CSU will face in recruiting and retaining a faculty of high quality during the coming decade due, in part, to excessive California housing costs. In light of the high cost of housing in San Diego County, coupled with the relatively low salaries earned by SDSU faculty, CSU/SDSU has determined that it is necessary to assist faculty and staff with obtaining affordable housing that is centrally located to the campus -- such assistance will presumably enable CSU/SDSU to recruit qualified faculty and staff.

Comment I-23-8	Comments from Susan Thomas, 7/20/2007	Response
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!	The comment expresses an opinion, and, while it also addresses the Draft EIR, the comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.	
Comment I-24-1	Comments from Bob and Mary Medearis, 7/20/2007	Response
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.	The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.  With respect to the safety of residents and schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than	

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traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

<b>Comment I-24-2</b>	<b>Comments from Bob and Mary Medearis, 7/20/2007</b>	<b>Response</b>
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!	Section 3.3, Biological Resources, of the Draft EIR addresses impacts associated with development of the proposed Adobe Falls Faculty/Staff Housing. A variety of mitigation measures are proposed for adoption to ensure that project implementation would result in less than significant impacts to sensitive wildlife and plant communities. (DEIR pp. 3.3-75 to 3.3-79.) These mitigation measures would be required to be implemented, as part of the CEQA mandated Mitigation & Monitoring Reporting Program, either prior to construction or during the design phase.	
	With regards to the additional traffic that would be generated by the proposed project, and specifically the Adobe Falls Faculty/Staff Housing, please see Section 3.14, Transportation/Circulation and Parking, of the Draft EIR. Section 3.14 addresses and analyzes the roadway capacities in the Del Cerro community, and concludes that there is adequate roadway capacity to support the proposed development -- accordingly, no significant impacts to traffic would follow buildout of the proposed project.	
<b>Comment I-24-3</b>	<b>Comments from Bob and Mary Medearis, 7/20/2007</b>	<b>Response</b>
We do not believe that the purposed housing will bring the desired gain that the University desires, especially as the Real Estate market fluctuates.	The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response can be provided or is required.	
<b>Comment I-24-4</b>	<b>Comments from Bob and Mary Medearis,</b>	<b>Response</b>
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	The Draft EIR determined that due to the isolated location of the Lower Village component of the Adobe Falls Faculty/Staff Housing, access in and out of the	

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not be left for "after the fact" resolution, as we have been repeatedly told they would be.

proposed development would be limited. Accordingly, in case of a fire or other emergency, quick evacuation from the site may be hampered by the limited access routes. This is a potentially significant impact. (DEIR p. 3.13-29.) In order to reduce this impact to a level below significant, the Draft EIR proposes Mitigation Measure PSS-6, which requires SDSU to work with the City of San Diego Fire Department to identify measures that will facilitate ingress and egress from the Lower Village prior to construction. (DEIR p. 3.13-36.)

Comment I-24-5	Comments from Bob and Mary Medearis,	Response
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.		The comment expresses an opinion and raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not raise an environmental issue, no further response is required.
Comment I-25-1	Comments from John D. Bardell, 7/22/2007	Response
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.		As set forth in the project description, the Adobe Falls Faculty/Staff Housing is designed for the exclusive use of faculty and staff. (DEIR pp. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.) Further, as required by CEQA, the environmental analysis set forth in the Draft EIR is premised on this very project description. Any amendment to this description (e.g., converting faculty/staff housing to university student housing) that would alter the environmental impact analysis may warrant further environmental review. Therefore, the Draft EIR itself already provides assurances that the Adobe Falls Faculty/Staff Housing will be used only by faculty and staff.
Comment I-25-2	Comments from John D. Bardell, 7/22/2007	Response
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		CSU/SDSU acknowledges the commentator's opposition to the proposed project, specifically the Adobe Falls Faculty/Staff Housing's use of alternate access through the Smoke Tree Condominium Residences. However, the commentator should note that the Smoke Tree access route for the Lower Village component of the Adobe Falls Faculty/Staff Housing was analyzed at the program level and as an alternate access route. (DEIR pp. 5.0-33 to 5.0-49.) The fact that the Draft EIR analyzed this at the program level means that additional environmental review and approval will be required before the Lower Village will be built out and/or access is secured through use of the Smoke Tree community's roads. Upon undertaking this additional

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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.

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

environmental review, the roadway capacity of Smoke Tree's roads, the western portion of Adobe Falls Road, and Waring Road will be further evaluated and the proposed project's impacts will be further assessed.

The Draft EIR analyzed the traffic impacts associated with the alternate access route at a program level of review. (DEIR pp. 3.14-88 to 3.14-90.) The analysis determined that buildout of the Lower Village may result in anywhere from 600 to 2,800 average daily trips. (DEIR p. 3.14-89.) A field review of the area and a review of area maps reveal that the two roads that will need to carry the majority of project-related traffic are Adobe Falls Road (west) and Waring Road. (DEIR p. 3.14-89.) Both roads have adequate capacity to accommodate the proposed project in addition to existing traffic. (DEIR p. 3.14-90.)

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### Comment I-25-3

### Comments from John D. Bardell, 7/22/2007

### Response

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I also disagree that the western side of Adobe Falls Road can handle 6,500 ADT's 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 as well.

The western segment of Adobe Falls Road is classified as a 2-lane collector roadway pursuant to the City of San Diego's Street Design Manual. Therefore, the total roadway capacity is 6,500 average daily trips ("ADT"). An existing traffic count was conducted on this western segment of Adobe Falls Road, which revealed an existing ADT count of 3,690. Therefore, the segment can accommodate approximately an additional 2,800 ADT and still operate at an acceptable level of service. Since the proposed project is estimated to only add a maximum of 2,800 ADT to this segment of Adobe Falls Road, the impact would be less than significant. (DEIR pp. 3.14-89 to 3.14-90.)

With regards to the "Levanto condominium project," this related project was considered in the cumulative impacts analysis. At some point during the development process, the Levanto condominium project changed names and became known as the William Lyons Homes - Grantville project. (DEIR p. 2.0-4.) As provided in the Draft EIR, the traffic impacts analysis considered the cumulative traffic impacts associated with pending (such as the William Lyons Home - Grantville project) and probable future projects both in the near-term and horizon year analysis. (DEIR p. 3.14-99.)

The other project referenced in the comment appears to be the 36-unit Waring Gardens Apartment expansion project, located at 5320-5340 Adobe Falls Road. This project, according to City of San Diego staff, is presently "on hold." In the event that this expansion project goes forward, any additional vehicle trips that may be generated along Adobe Falls Road, which would presumably be relatively limited given the small size of the expansion project,

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would be accounted for in the project-level traffic impact analysis for the Lower Village component of the Adobe Falls Faculty/Staff Housing.

Comment I-25-4	Comments from John D. Bardell, 7/22/2007	Response
<p>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.</p>	<p>As previously discussed in Response to Comment I25-2, above, in the event the Smoke Tree alternate access route is selected for further consideration, additional environmental review will be conducted with respect to all impact categories, including air quality and aesthetics.</p> <p>With regards to the potential for visual quality deterioration, the Draft EIR notes that, depending on the location of the access route through the Smoke Tree residences, construction may result in large retaining walls and concrete structures, which may result in visual impacts. (DEIR pp. 5.0-39 to 5.0-40.) These potential visual impacts will be studied in greater detail when project level review is undertaken for the Lower Village component of the Adobe Falls Faculty/Staff Housing. The comment's concern for air quality deterioration is also noted; however, construction related emissions (e.g., those that would result from building a bridge over the flood control channels) are not analyzed until project level review.</p>	
Comment I-25-5	Comments from John D. Bardell, 7/22/2007	Response
<p>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.</p>	<p>The Draft EIR notes that the Alvarado Creek flows through the proposed site for the Adobe Falls Faculty/Staff Housing, generally from east to west, entering the site via a culvert at the southeastern end, and exiting at the northwest end via a manmade concrete channel -- this northwest exit is near the Smoke Tree residences. (DEIR p. 3.7-10.) The Draft EIR further provides that development of the Adobe Falls Faculty/Staff Housing site would reduce infiltration as a result of an increase in impervious surfaces in presently undeveloped areas that either drain to Alvarado Creek or naturally percolate into the soil. The increase in runoff volumes for each storm event represents a potentially significant impact. (DEIR p. 3.7-16.) In response, the Draft EIR includes Mitigation Measure HWQ-2, which requires SDSU to conduct a detailed site-specific hydrologic analysis of the proposed site in order to further assess the effects of the proposed project on the flood plain and, based on that analysis, determine whether on-site detention facilities are needed. This hydrologic analysis would need to occur prior to the preparation of final design plans for the Adobe Falls Faculty/Staff Housing. (DEIR p. 3.7-29.)</p>	
Comment I-26-1	Comments from Anita Colmie, 7/22/2007	Response

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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.

As set forth in the project description, the Adobe Falls Faculty/Staff Housing is designed for the exclusive use of faculty and staff. (DEIR pp. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.) Further, as required by CEQA, the environmental analysis set forth in the Draft EIR is premised on this very project description. Any amendment to this description (e.g., converting faculty/staff housing to university student housing) that would alter the environmental impact analysis may warrant further environmental review. Therefore, the Draft EIR itself already provides assurances that the Adobe Falls Faculty/Staff Housing will be used only by faculty and staff.

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### Comment I-26-2

### Comments from Anita Colmie, 7/22/2007

### Response

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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 1,600 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.

Furthermore, in the 2005 withdrawn EIR, Appendix 0, 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.

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

CSU/SDSU acknowledges the commentator's opposition to the proposed project, specifically the Adobe Falls Faculty/ Staff Housing's use of an alternate access route through the Smoke Tree Condominium Residences. The commentator should note that the Smoke Tree access route for the Lower Village component of the Adobe Falls Faculty/Staff Housing was analyzed at the program level and as an alternate access route. (DEIR pp. 5.0-33 to 5.0-49.) The fact that the Draft EIR analyzed this at the program level means that additional environmental review and approval will be required before the Lower Village will be built out and/or access is secured through use of the Smoke Tree community's roads. Upon undertaking this additional environmental review, the roadway capacity of Smoke Tree's roads, the western portion of Adobe Falls Road, and Waring Road will be further evaluated and the proposed project's impacts will be further assessed. This analysis would also consider whether improvements to the roadways in the Smoke Tree complex would be necessary. In addition, this future project-level review would contemplate safety risks to residents of Smoke Tree, emergency vehicle access, and other potential environmental impacts affiliated with buildout of the Lower Village component of the Adobe Falls Faculty/Staff Housing. (See DEIR pp. 5.0-39 to 5.0-40 [identifying some potential impacts associated with use of Smoke Tree's roadway network for vehicular access to the Adobe Falls Faculty/Staff Housing that would be evaluated at project-level review for buildout of the Lower Village component].)

The Draft EIR program level of review determined that buildout of the Lower Village may result in anywhere from 600 to 2,800 average daily trips. (DEIR p. 3.14-89.) A field review of the area and a review of area maps reveal that the two roads that will need to carry the majority of project-related traffic are Adobe Falls Road (west) and Waring Road. (DEIR p. 3.14-89.) Both roads have adequate capacity to accommodate the proposed project in addition to existing traffic. (DEIR p. 3.14-90.)



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### Comment I-26-3

### Comments from Anita Colmie, 7/22/2007

### Response

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.

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.

The western segment of Adobe Falls Road is classified as a 2-lane collector roadway pursuant to the City of San Diego's Street Design Manual. Therefore, the total roadway capacity is 6,500 average daily trips ("ADT"). An existing traffic count was conducted on this western segment of Adobe Falls Road, which revealed an existing ADT count of 3,690. Therefore, the segment can accommodate approximately an additional 2,800 ADT and still operate at an acceptable level of service. Since the proposed project is estimated to only add a maximum of 2,800 ADT to this segment of Adobe Falls Road, the impact would be less than significant. (DEIR pp. 3.14-89 to 3.14-90.)

With regards to the "Levanto condominium project," this related project was considered in the cumulative impacts analysis. At some point during the development process, the Levanto condominium project changed names and became known as the William Lyons Homes - Grantville project. (DEIR p. 2.0-4.) As provided in the Draft EIR, the traffic impacts analysis considered the cumulative traffic impacts associated with pending (such as the William Lyons Home - Grantville project) and probable future projects both in the near-term and horizon year analysis. (DEIR p. 3.14-99.)

The other project referenced in the comment appears to be the 36-unit Waring Gardens Apartment expansion project, located at 5320-5340 Adobe Falls Road. This project, according to City of San Diego staff, is presently "on hold." In the event that this expansion project goes forward, any additional vehicle trips that may be generated along Adobe Falls Road, which would presumably be relatively limited given the small size of the expansion project, would be accounted for in the project-level traffic impact analysis for the Lower Village component of the Adobe Falls Faculty/Staff Housing.

### Comment I-26-4

### Comments from Anita Colmie, 7/22/2007

### Response

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.

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

As previously discussed in Response to Comment I26-2, above, in the event the Smoke Tree alternate access route is selected for further consideration, additional environmental review will be conducted with respect to all impact categories, including air quality and aesthetics.

With regards to the potential for visual quality deterioration, the Draft EIR notes that, depending on the location of the access route through the Smoke Tree residences, construction may result in large retaining walls and concrete structures, which may result in visual impacts. (DEIR pp. 5.0-39 to 5.0-40.)

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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.

These potential visual impacts will be studied in greater detail when project level review is undertaken for the Lower Village component of the Adobe Falls Faculty/Staff Housing. The comment's concern for air quality deterioration is also noted; however, construction related emissions (e.g., those that would result from building a bridge over the flood control channels) are not analyzed until project level review.

Comment I-26-5	Comments from Anita Colmie, 7/22/2007	Response
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 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.	Preliminarily, as noted above, the Adobe Falls Alternate Access route scenario was analyzed at the program level of review; therefore, additional environmental review will be conducted in the event the alternate access route is selected for further consideration.	As noted in the comment, the Draft EIR considers whether selection of an alternative access route through the Smoke Tree residences would result in a significant impact. (DEIR p. 3.10-15.) The existing average daily trip ("ADT") level on Adobe Falls Road is 3,690. Based on this volume of traffic, existing ambient noise levels at adjacent residential sensitive receptors are well below 65 dB on Adobe Falls Road. Under the alternate access scenario through the Smoke Tree complex, the proposed project would add up to 2,800 average daily trips to Adobe Falls Road. This additional traffic would increase the noise level by approximately two dB CNEL. This two dB CNEL increase is not considered to be a substantial increase in the ambient noise levels; therefore, the project would not result in significant noise impacts to off-site Adobe Falls Road uses due to the increased traffic volumes.

Comment I-26-6	Comments from Anita Colmie, 7/22/2007	Response
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.	The Draft EIR notes that the Alvarado Creek flows through the proposed site for the Adobe Falls Faculty/Staff Housing, generally from east to west, entering the site via a culvert at the southeastern end, and exiting at the northwest end via a manmade concrete channel -- this northwest exit is near the Smoke Tree residences. (DEIR p. 3.7-10.) The Draft EIR further provides that development of the Adobe Falls Faculty/Staff Housing site would reduce infiltration as a result of an increase in impervious surfaces in presently undeveloped areas that either drain to Alvarado Creek or naturally percolate into the soil. The increase in runoff volumes for each storm event represents a potentially significant impact. (DEIR p. 3.7-16.) In response, the Draft EIR includes Mitigation Measure HWQ-2, which requires SDSU to conduct a detailed site-specific hydrologic analysis of the proposed site in order to further assess the effects of the proposed project on the flood plain and, based on that analysis, determine whether on-site detention facilities are	

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needed. This hydrologic analysis would need to occur prior to the preparation of final design plans for the Adobe Falls Faculty/Staff Housing. (DEIR p. 3.7-29.)

Comment I-26-7	Comments from Anita Colmie, 7/22/2007	Response
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.	As indicated in the June 2007 Dudek Noise Technical Report (included as Appendix K to the Draft EIR), all noise measurements were taken between 10:10 am to 2:05 pm (Noise Technical Report, pg. 16). Traffic noise is a function of vehicle speed, and the number of vehicles present on the roadway. During periods of roadway congestion, vehicle speeds drop, traffic flow becomes broken, and noise associated with the congested roadway segment(s) decreases as compared to free flowing traffic conditions. The protocols for short-term traffic noise measurement therefore prescribe that the peak transportation hours for the roadway facility be avoided. Measurements of traffic noise obtained during the middle of the day, outside of traffic congestion periods, are more representative for noise levels associated with maximum vehicle speeds and a steady flow of vehicles past the measurement point.	As described in the Draft EIR, the Community Noise Equivalent Level (CNEL) is used to evaluate long-term characteristics of sound. The CNEL is a 24-hour average A-weighted sound level with 10-dB added to noise during the nighttime hours (10 PM to 7 AM) and 5 dB added to noise levels in the evening hours (8 pm to 10 PM) to account for the greater sensitivity of receptors to noise in these periods (DEIR, p. 3.10-1 and 3.10-3). Most communities employ a 24-hour weighted average (CNEL or LDN) in managing noise sensitive land uses because it is a reasonable representation of the daily noise exposure pattern for community residents. The contribution of infrequent instantaneous noise events well above the background noise level generally does not alter the resulting CNEL level, because the duration of these louder events are only a small fraction of the 24-hour averaging period. Therefore, while trolley braking may be an audible event when traffic volumes are low on area roadways, these trolley-related noise events would not skew the calculated CNEL associated with traffic noise along major transportation corridors.
	The retaining wall constructed to accommodate the trolley alignment replaced a portion of the natural slope face present prior to the trolley line development. A person standing very close to the face of the retaining wall might notice a slight increase in the sound levels associated with I-8 traffic, from sound reflection off the concrete surface of the retaining wall, as	

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compared to the former levels from the natural slope face. However, the minor change in sound absorption rates verses reflection with regard to the trolley retaining wall would not be discernible on the opposite side of I-8 from the trolley alignment; the direct contribution of noise from vehicular traffic on I-8 would overwhelm this difference in reflection rates. The presence of the trolley retaining wall therefore would not produce a significant amplifying effect on the existing noise levels within the Alvarado Canyon area.

The City of San Diego approved use of the following significance threshold regarding project-related traffic noise increases: A significant noise impact would result if the project would increase the existing noise level by three dB or more in areas where the existing noise level exceeds 65 dB CNEL. As indicated in the Noise Technical Report, (included as Appendix K to the Draft EIR), the difference between noise generated by 2004 and 2007 ADT traffic volumes is acoustically insignificant (Noise Technical Report, pg. 16). This conclusion is reached because the traffic related noise levels increase in the range from 0 to 0.7 dB (these are both well below the 3 dB significance threshold). The accuracy of precision sound level meters is approximately one (1) dB; therefore the calculated noise level changes are not within the accuracy limits of field measurements. For this reason, 2004 measurements were not updated during preparation of the 2007 Noise Technical Report.

The noise measurement locations that are depicted on EIR Figure 3.10-2 were conducted near the northern extent of the proposed development sites because those locations are representative of the existing noise levels to which adjacent existing residents (i.e., Adobe Falls Road homes) are exposed. Given that the noise impact discussion focuses on the impacts of the proposed project on those surrounding residents (including project-generated traffic along the eastern extent of the Adobe Falls Road/Del Cerro Boulevard system), it was appropriate to take measurements at these locations. These points also allow the best data for accurate calibration of the noise model, since noise from traffic along I-8 travels across a variety of terrain conditions prior to reaching the measurement locations; measured noise levels were compared against predicted noise levels as part of the noise model calibration procedure.

In areas where the ambient noise environment is controlled or dictated primarily by roadway traffic, a 24-hour average noise level (CNEL) can be determined based on a single noise measurement and use of traffic noise modeling software. The traffic modeling software performs calculations for normal distribution of daily roadway traffic volumes into appropriate time

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periods, and calculates the resulting CNEL value. As long as roadway traffic volume data is accurate, a model such as the FHWA TNM 2.5 produces consistently reliable CNEL prediction information. This protocol is widely used in transportation-related or controlled noise studies.

Comment I-26-8	Comments from Anita Colmie, 7/22/2007	Response
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.	The ambient background concentrations of the criteria pollutants utilized in the Draft EIR air quality analysis were taken from San Diego Air Pollution Control District ("SDAPCD") ambient monitoring stations located at San Diego 12th Avenue, Overland Avenue, and El Cajon. (Draft EIR p. 3.2-8 - 9.) The SDAPCD is charged with selecting the locations of the monitoring stations, and the air quality at the selected sites is to be representative of air quality levels throughout the County. Therefore, the monitoring station locations utilized for the EIR air quality analysis are sufficiently representative of the SDSU area, including the Adobe Falls Faculty/Staff Housing site, in that any variation in actual pollutant levels would be statistically insignificant.	Please also see the Draft EIR health risk analysis at section 3.2.6.2.
Comment I-26-9	Comments from Anita Colmie, 7/22/2007	Response
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.	The comment incorrectly states that SDSU does not have authority to purchase property. In fact, SDSU may purchase property; it may not, however, sell campus property.  Also, to the extent the comment suggests that the proposed Adobe Falls site should be placed in a "preserve system" and SDSU should purchase additional property upon which to expand the campus, the propriety of a similar alternative (i.e., securing an off-campus location upon which to expand) was considered in Section 5.0, Alternatives, of the Draft EIR. (DEIR pp. 5.0-3 to 5.0-4.) In sum, because SDSU's cost basis in the Adobe Falls Faculty/Staff Housing property is already low (in light of its long-term ownership of the property), only the proposed site can further the project's objective to provide affordable housing for faculty and staff.	
Comment I-26-10	Comments from Anita Colmie, 7/22/2007	Response
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 5, Figure 9b-2.	The commentor is correct. The picture and visual simulation on Figure 3.1-22 (Draft EIR) and Figure 9b-2 (Visual Quality Technical Report, included as Appendix B to the Draft EIR), are taken from College Avenue looking north to the Upper Village site rather than Mill Peak Road. The captions under both of these images should read: "Existing Conditions of Adobe Falls Upper Village	

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looking from College Avenue" and "Visual Simulation of Adobe Falls Upper Village looking from College Avenue," respectively. Both of these figures have been revised accordingly and are included as components of the Final EIR.

Comment I-26-11	Comments from Anita Colmie, 7/22/2007	Response
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.		The comment is noted; the Final EIR will contain a revised Appendix E.

Thank you for your consideration into these matters.

Comment I-27-1	Comments from Brian, Susan & Hailey Andrews, 7/22/2007	Response
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.		<p>This comment, in part, expresses an opinion. While the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project, those portions of this comment which express an opinion and do not address or question the content of the Draft EIR do not require further response.</p> <p>With respect to environmentally sensitive lands, Draft EIR Section 3.3 analyzed the potential impacts of the proposed project on biological resources in the Adobe Falls area and determined that any significant impacts to such resources would be mitigated to a level below significant.</p> <p>Additionally, there is no evidence to suggest that development of the proposed Adobe Falls Faculty/Staff Housing project would have a negative effect on surrounding property values. As discussed in the Draft EIR, the proposed project would provide multi-family housing in an area that is presently surrounded by single- and multi-family dwelling units.</p> <p>Finally, SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA.</p>

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### Comment I-27-2

### Comments from Brian, Susan & Hailey Andrews, 7/22/2007

### Response

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 disclose 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?

With respect to the number of vehicle trips generated by the Lower Village component of the Adobe Falls Faculty/Staff Housing, the 1040 average daily trip ("ADT") figure identified in Figure 8-4 is a typographical error. The correct figure, and the figure upon which the Draft EIR's analysis appropriately relies, is 990 ADT. (DEIR p. 3.14-37.) Therefore, the reason that the Draft EIR contains the 1040 ADT figure only once is because the use of the figure was an error. This error (i.e., the representation in Figure 8-4 that the proposed Lower Village would generate 1040 ADT) will be corrected in the Final EIR section entitled "Revised Draft EIR Pages."

A full and thorough analysis of the impacts to the Del Cerro community's roadways, including Adobe Falls Road, is presented in the Draft EIR; and, this analysis correctly assumes that the proposed Lower Village would result in the addition of 990 ADT. (DEIR pp. 3.14-37; 3.14-69; 3.14-81.) The analysis demonstrates that even with the addition of 990 ADT, Adobe Falls Road/Mill Peak Road will not exceed its operating capacity; therefore, the proposed project would result in a less than significant impact to these roadways.

As to the comment's concern for the "existing uniquely sloped grade" on Adobe Falls Road, this factor was considered in classifying the road's capacity and subsequently analyzing project related impacts. (DEIR p. 3.14-12; see also General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.)

### Comment I-27-3

### Comments from Brian, Susan & Hailey Andrews, 7/22/2007

### Response

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.

The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.

### Comment I-27-4

### Comments from Brian, Susan & Hailey Andrews, 7/22/2007

### Response

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

The EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts

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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 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.

in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.

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### Comment I-27-5

### Comments from Brian, Susan & Hailey Andrews, 7/22/2007

### Response

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.

The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; an LOS exceeding "D," (i.e., LOS E) is considered by the City to be operating at deficient conditions. Therefore, at LOS C (or D) operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS D, based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.

With respect to the safety of residents and schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

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### Comment I-27-6

### Comments from Brian, Susan & Hailey Andrews, 7/22/2007

### Response

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

The Draft EIR determined that the proposed project would result in significant impacts at the Del Cerro Boulevard/College Avenue intersection. (DEIR p. 3.14-74.) To mitigate the potential impacts that would follow implementation of the proposed project at this intersection, the Draft EIR includes mitigation measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the costs to provide two left-turn lanes and one shared



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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.

through/right turn lane on the westbound approach. (DEIR p. 3.14-110.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (DEIR p. 3.14-114.) With implementation of this mitigation measure, the potential impacts to the Del Cerro Boulevard/College Avenue intersection would be reduced to less than significant.

Also, as discussed in Draft EIR Section 3.14, the proposed Adobe Falls Faculty/Staff Housing project component would not result in significant impacts relating to traffic and, therefore, the additional traffic associated with the proposed project would not result in a significant impact to emergency medical service access. (DEIR p. 3.14-98.) Additionally, as discussed in DEIR Section 3.13, Public Utilities and Services Systems, emergency response vehicles have the right-of-way and are exempted from rules of the road in emergency situations. Therefore, any surrounding traffic that would be on the roadways must yield the right-of-way and immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and stop until the emergency vehicle has passed. (DEIR pp. 3.13-28 - 29.)

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**Comment I-27-7****Comments from Brian, Susan & Hailey Andrews, 7/22/2007****Response**

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.

To the extent that the comment expresses an opinion regarding the propriety of purchasing additional property upon which to further the campus expansion objectives, please see Section 5.0, Alternatives, of the Draft EIR for discussion relating to the consideration of off-campus alternative locations. (DEIR pp. 5.0-3 to 5.0-4.) In sum, because SDSU's cost basis in the Adobe Falls Faculty/Staff Housing property is already low (in light of its long-term ownership of the property), only the proposed site can further the project's objective to provide affordable housing for faculty and staff.

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**Comment I-27-8****Comments from Brian, Susan & Hailey Andrews, 7/22/2007****Response**

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.

Preliminarily, restoration of the Adobe Falls, and the development of any trails on the Adobe Falls site, would not occur until development of the Lower Village. (See, e.g., Final EIR Mitigation Measure CR-4.) The Lower Village will be developed over the long-term, sometime beyond the year 2012, with no commencement date presently planned. (Draft EIR p. 1.0-36.) Accordingly, the Lower Village site was analyzed in the EIR at the program level of review, and development of the site will undergo additional CEQA analysis prior to project construction. During subsequent development phases, the Lower Village trail system will be designed, and any/all impacts associated with the

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trails will be assessed. However, it is presently contemplated that the trails to be developed on the Adobe Falls Lower Village site will be developed for use by the residents of the Adobe Falls Faculty/Staff Housing community, not for use by the general public. Therefore, with resident use of the trails, no additional vehicle trips would be generated. Moreover, even if the trails were available for public use, any vehicle traffic generated would be relatively minimal.

<b>Comment I-27-9</b>	<b>Comments from Brian, Susan &amp; Hailey Andrews, 7/22/2007</b>	<b>Response</b>
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.		The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.
<b>Comment I-28-1</b>	<b>Comments from Kathy Fennell, 7/22/2007</b>	<b>Response</b>
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.		The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.
<b>Comment I-28-2</b>	<b>Comments from Kathy Fennell, 7/22/2007</b>	<b>Response</b>
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.		<p>A full and thorough analysis of the impacts to the Del Cerro community's roadways, including Adobe Falls Road, is presented in the Draft EIR; and, this analysis correctly assumes that the proposed Lower Village would result in the addition of 990 ADT. (DEIR pp. 3.14-37; 3.14-69; 3.14-81.) The analysis demonstrates that even with the addition of 990 ADT, Adobe Falls Road/Mill Peak Road will not exceed its operating capacity.</p> <p>As to the comment's concern for the "slope and narrowness" of Adobe Falls Road, this factor was considered in classifying the road's capacity and subsequently analyzing project related impacts. (DEIR p. 3.14-12; see also General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.)</p>
<b>Comment I-28-3</b>	<b>Comments from Kathy Fennell, 7/22/2007</b>	<b>Response</b>
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		The comment incorrectly states that the proposed project "will increase the ADT's of Del Cerro Blvd past a recommended level." The 5000 ADT capacity

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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.

assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." The City of San Diego utilizes LOS "D" as its minimum LOS; a LOS exceeding "D," (i.e., LOS E) is considered by the City to be operating at deficient conditions. Therefore, at LOS C (or D) operations, Del Cerro Boulevard is not operating at deficient conditions. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS D, based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.

The Draft EIR determined that the proposed project would result in significant impacts at the Del Cerro Boulevard/College Avenue intersection. (DEIR p. 3.14-74.) To mitigate the potential impacts that would follow implementation of the proposed project at this intersection, the Draft EIR includes mitigation measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the costs to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-110.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (DEIR p. 3.14-114.) With implementation of this mitigation measure, the potential impacts to the Del Cerro Boulevard/College Avenue intersection would be reduced to less than significant.

With respect to the safety of residents and schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Comment I-28-4	Comments from Kathy Fennell, 7/22/2007	Response
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	The Draft EIR adequately addresses the potential impacts of the proposed project relative to traffic and safety impacts; no further analysis is necessary. Moreover, SDSU/CSU will be making a request to the Governor and Legislature for mitigation funding following approval of the project. The	

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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.

remainder of the comments represent the opinion of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.

Comment I-29-1	Comments from Sumner K. Emery, 7/23/2007	Response
<p>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.</p> <p>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!</p> <p>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).</p> <p>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.</p> <p>You can be assured San Diego State University will be critically judged by the consequences of their action – not their intentions!</p>	<p>To the extent the comment expresses an opinion regarding whether the density planned for Adobe Falls Faculty/Staff Housing is too high, that opinion is incorrect. The proposed project does not exceed density allocations permitted by applicable land use plans. The proposed project would result in a density of 11.2 units per acre, which falls within the definition of the Navajo Community Plan's "low-medium" density parameters of 10-14 units per acre. (DEIR p. 3.8-25.)</p> <p>Also, with respect to the safety of residents and schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.</p> <p>The remainder of the comment expresses the opinions of the commentator, and will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.</p>	
Comment I-30-1	Comments from Walt and Marilyn Tom, 7/23/2007	Response
<p>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.</p>	<p>SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Draft EIR Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the</p>	

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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.

amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA. (Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding roadway capacity.)

The EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (Draft EIR p. 3.14-99.) In response, the EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (Draft EIR p. 3.14-107.) The Study is to focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel school. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Comment I-30-2	Comments from Walt and Marilyn Tom, 7/23/2007	Response
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.	As discussed in EIR Section 3.14, the proposed Adobe Falls Faculty/Staff Housing project component would not result in significant impacts relating to traffic and, therefore, the additional traffic associated with the proposed project would not result in a significant impact to emergency medical service access. (DEIR p. 3.14-98.) Additionally, as discussed in Draft EIR Section 3.13, Public Utilities and Services Systems, emergency response vehicles have the right-of-way and are exempted from rules of the road in emergency situations. Therefore, any surrounding traffic that would be on the roadways must yield the right-of-way and immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and stop until the emergency vehicle has passed. (DEIR pp. 3.13-28 to 3.13-29.)	
Comment I-30-3	Comments from Walt and Marilyn Tom, 7/23/2007	Response
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 Emanuel. Upon its completion next year, additional traffic will be generated. A new traffic survey will be needed after the new facility is in use.	With respect to the safety of residents and schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study is to focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst	

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Elementary School and the Temple Emanuel school. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

The comment incorrectly states that a "new traffic survey will be needed after the new facility [Temple Emanuel] is in use." The traffic analysis presented in Section 3.14, Transportation/Circulation and Parking, of the Draft EIR already considers the proposed construction and expansion of Temple Emanuel. This project, which proposes the demolition of the existing sanctuary and construction of a new sanctuary, is included in the cumulative projects analysis. (DEIR p. 3.14-53.) The proposed Temple Emanuel project is not expected to increase the typical weekday trip generation rate. However, Friday evening and Saturday traffic may increase during services that attract more attendees than the current sanctuary can accommodate. This potential for increased trip generation rates (on Friday evenings and Saturdays) was considered in the near-term analysis, and the impact was found to be less than significant. (DEIR p. 3.14-99.)

Comment I-30-4	Comments from Walt and Marilyn Tom, 7/23/2007	Response
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.	The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.	
Comment I-31-1	Comments from Ray and Suzanne Schumacher, 7/23/2007	Response
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 demand and need for the faculty/staff housing proposed is discussed in Section 1.0, Project Description, of the Draft EIR. (DEIR pp. 1.0-25 to 1.0-27.) In order to accommodate the anticipated 10,000 full-time equivalent student ("FTES") growth, SDSU must hire approximately 691 additional faculty and 591 additional staff members over the years, through 2024-2025. The Draft EIR notes that CSU has adopted a report addressing the serious constraints CSU will face in recruiting and retaining a faculty of high quality during the coming decade due, in part, to excessive California housing costs. In light of the high cost of housing in San Diego County, coupled with the relatively low salaries earned by SDSU faculty, CSU/SDSU has determined that it is necessary to assist faculty and staff with obtaining affordable housing that is centrally located to the campus -- such assistance will assist CSU/SDSU in its ability to recruit qualified faculty and staff.  The comment also raises philosophical, economic, social, and/or political issues that do not appear to relate to the content of the Draft EIR. The comment will be included as part of the record and made available to San	

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the years toward teachers' salaries or scholarships and stipends.

Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not raise an environmental issue, no further response is required.

Comment I-31-2	Comments from Ray and Suzanne Schumacher, 7/23/2007	Response
<p>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:</p> <p>(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.</p>	<p>A full and thorough analysis of the impacts to the Del Cerro community's roadways is presented in the Draft EIR; and, this analysis correctly assumes that the proposed Lower Village would result in the addition of 990 ADT. That analysis concludes that the Del Cerro community's roadways, including Adobe Falls Road, have adequate capacity to accommodate the proposed project and would not operate at an unacceptable level of service ("LOS"). (DEIR pp. 3.14-69; 3.14-81.) In light of the fact that the roadways have adequate capacity and would operate at acceptable service levels, the Draft EIR concludes that the proposed project would result in less than significant impacts.</p> <p>Also, please note that the "steep, narrow, twisting" nature of Adobe Falls Road was considered in classifying the road's capacity and subsequently analyzing project related impacts. (DEIR p. 3.14-12.) Additionally, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) Although the focus of the study will be on the vicinity of the elementary schools near the Del Cerro Boulevard/College Avenue intersection, the area of the Adobe Falls Road grade can be addressed as well. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.</p>	
Comment I-31-3	Comments from Ray and Suzanne Schumacher, 7/23/2007	Response
<p>(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 Resident 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.</p>	<p>The Del Cerro roadway classifications utilized in the EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information</p>	

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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.

regarding this subject.)

The EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.

SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Draft EIR Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA. (Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding roadway capacity.)

Comment I-31-4

Comments from Ray and Suzanne Schumacher, 7/23/2007

Response

(C) The EIR acknowledges Del Cerro Boulevard's maximum desirable capacity at 5,060 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.

The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; an LOS exceeding "D," (i.e., LOS E) is considered by the City to be operating at deficient conditions. Therefore, at LOS C (or D) operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS D, based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.□

With respect to the safety of residents and schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p.



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3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

<b>Comment I-31-5</b>	<b>Comments from Ray and Suzanne Schumacher, 7/23/2007</b>	<b>Response</b>
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.		The comment expresses an opinion, and raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.
<b>Comment I-32-1</b>	<b>Comments from Michael Haak, 7/23/2007</b>	<b>Response</b>
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.		The comment expresses an opinion, and is an introduction to comments that follow. No further response is required.
<b>Comment I-32-2</b>	<b>Comments from Michael Haak, 7/23/2007</b>	<b>Response</b>
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		As noted by the comment, the Draft EIR proposes mitigation measures requiring SDSU to make a fair-share contribution to the City of San Diego in order to improve the infrastructure in the campus area. Under CEQA, SDSU/CSU is not required to pay more than is necessary to mitigate the significant impacts of the proposed project; furthermore, CEQA requires that the mitigation measures be "roughly proportional" to the project generated impacts. (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341, 361-362.) SDSU's percentage contribution to the improvements required are set forth on pages 3.14-109 to 3.14-110 of

## Responses to Comments Report

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.

Section 3.14, Transportation/Circulation and Parking, of the Draft EIR. These percentages were calculated according to a formula routinely used by the City of San Diego to assess fair-share contributions.

Comment I-32-3	Comments from Michael Haak, 7/23/2007	Response
Other issues related to congestion, traffic mitigation, and safety, but specific to Del Cerro, include:		The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; a LOS exceeding "D," (i.e., LOS "E") is considered by the City to be operating at deficient conditions. Therefore, at LOS "C" (or "D") operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS "D," based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.
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.		With respect to the safety of schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study is to focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel school. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Comment I-32-4	Comments from Michael Haak, 7/23/2007	Response
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.		SDSU acknowledges the community's concerns with respect to the potential traffic impacts to the Del Cerro community that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways (including Adobe Falls Road) have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA.
Your review and response to these issues is respectfully requested.		

As to the comment's concern for the "steepness" on Adobe Falls Road, this

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factor was considered in classifying the road's capacity and subsequently analyzing project related impacts. (DEIR p. 3.14-12; see also General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.) Additionally, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) Although the focus of the study will be on the vicinity of the elementary schools near the Del Cerro Boulevard/College Avenue intersection, the area of the Adobe Falls Road grade can be addressed as well. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

### Comment I-33-1

### Comments from Leigh Jacobson, 7/23/2007

### Response

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.

SDSU acknowledges the community's concerns with respect to the potential traffic impacts to the Del Cerro community that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA.

With regards to the proposed project's impacts at the College Avenue/Del Cerro Boulevard intersection, the Draft EIR includes mitigation measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the costs to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-102.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (DEIR p. 3.14-114.)

The comment states that traffic is likely to increase following the reopening of Temple Emanuel. The traffic analysis presented in Section 3.14, Transportation/Circulation and Parking, of the Draft EIR already considers the proposed construction and expansion of Temple Emanuel. This project, which proposes the demolition of the existing sanctuary and construction of a

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new sanctuary, is included in the cumulative projects analysis. (DEIR p. 3.14-53.) The proposed Temple Emanuel project is not expected to increase the typical weekday trip generation rate. However, Friday evening and Saturday traffic may increase during services that attract more attendees than the current sanctuary can accommodate. This potential for increased trip generation rates (on Friday evenings and Saturdays) was considered in the near-term analysis, and a less than significant impact would result. (DEIR p. 3.14-99.)

Comment I-33-2	Comments from Leigh Jacobson, 7/23/2007	Response
<p>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 Peak 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.</p> <p>The above are only two areas of concern that have not been adequately addressed in the E.I.R.</p>	<p>As discussed in Draft EIR Section 3.14, the proposed Adobe Falls Faculty/Staff Housing project component would not result in significant impacts relating to traffic and, therefore, the additional traffic associated with the proposed project would not result in a significant impact to emergency medical service access. (DEIR p. 3.14-98.) Additionally, as discussed in Section 3.13, Public Utilities and Services Systems, emergency response vehicles have the right-of-way and are exempted from rules of the road in emergency situations. Therefore, any surrounding traffic that would be on the roadways must yield the right-of-way and immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and stop until the emergency vehicle has passed. (DEIR pp. 3.13-28 to 3.13-29.)</p> <p>To the extent that this comment expresses concern regarding access to the Adobe Falls Faculty/Staff Housing, the Draft EIR does conclude that due to the isolated location of the Lower Village, access in and out of the proposed development would be limited. Accordingly, in case of a fire or other emergency, quick evacuation from the site may be hampered by the limited access routes. This is a potentially significant impact. (DEIR p. 3.13-29.) In order to reduce this impact to a level below significant, the Draft EIR proposes Mitigation Measure PSS-6, which requires SDSU to work with the City of San Diego Fire Department to identify measures that will facilitate ingress and egress from the Lower Village prior to construction. (DEIR p. 3.13-36.)</p>	

Comment I-34-1	Comments from Joanna Myers, 7/23/2007	Response
<p>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.</p> <p>The following points call out some of the erroneous information covered in the EIR:</p>	<p>The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information</p>	

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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.

regarding this subject. Additionally, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) Although the focus of the study will be on the vicinity of the elementary schools near the Del Cerro Boulevard/College Avenue intersection, the area of the Adobe Falls Road grade can be addressed as well. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

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**Comment I-34-2****Comments from Joanna Myers, 7/23/2007****Response**

2. The EIR states the Adobe Falls will be restored and bails 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.

Preliminarily, restoration of the Adobe Falls, and the development of any trails on the Adobe Falls site, would not occur until development of the Lower Village. (See, e.g., Final EIR Mitigation Measure CR-4.) The Lower Village will be developed over the long-term, sometime beyond the year 2012, with no commencement date presently planned. (Draft EIR p. 1.0-36.) Accordingly, the Lower Village site was analyzed in the EIR at the program level of review, and development of the site will undergo additional CEQA analysis prior to project construction. During subsequent development phases, the Lower Village trail system will be designed, and any/all impacts associated with the trails will be assessed. However, it is presently contemplated that the trails to be developed on the Adobe Falls Lower Village site will be developed for use by the residents of the Adobe Falls Faculty/Staff Housing community, not for use by the general public. Therefore, with resident use of the trails, no additional vehicle trips would be generated. Moreover, even if the trails were available for public use, any vehicle traffic generated would be relatively minimal.

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**Comment I-34-3****Comments from Joanna Myers, 7/23/2007****Response**

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 like to 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.

The premise of the comment is incorrect. SDSU can purchase property for campus uses, but it does not have the power or authority to sell campus property, such as the Adobe Falls site.

To the extent that the comment expresses an opinion regarding the propriety of purchasing additional property upon which to further the campus expansion objectives, please see Section 5.0, Alternatives, of the Draft EIR for discussion relating to the consideration of off-campus alternative locations. (DEIR pp. 5.0-3 to 5.0-4.) In sum, because SDSU's cost basis in the Adobe

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Falls Faculty/Staff Housing property is already low (in light of its long-term ownership of the property), only the proposed site can further the project's objective to provide affordable housing for faculty and staff.

In addition, the proposed project's impact on sensitive species is addressed in Section 3.3, Biological Resources, of the Draft EIR. Section 3.3 includes an analysis of vegetation, flora, wetlands, wildlife, and wildlife habitat at the Adobe Falls Faculty/Staff Housing's proposed site. The Draft EIR concludes that all potentially significant impacts to sensitive species would be reduced to less than significant levels with the adoption of the mitigation measures proposed.

Comment I-34-4	Comments from Joanna Myers, 7/23/2007	Response
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.	<p>With respect to the comment regarding the number of vehicle trips generated by the Lower Village component of the Adobe Falls Faculty/Staff Housing, the 1040 average daily trip ("ADT") figure identified in Figure 8-4 is a typographical error. The correct figure, and the figure upon which the Draft EIR's analysis appropriately relies, is 990 ADT. (DEIR p. 3.14-37.) Therefore, the reason that the Draft EIR contains the 1040 ADT figure only once is because the use of the figure was an error. (This error (i.e., the representation in Figure 8-4 that the proposed Lower Village would generate 1040 ADT) will be corrected in the Final EIR section entitled "Revised Draft EIR Pages.") [Confirm with O4-3 once final.]</p> <p>A full and thorough analysis of the impacts to the Del Cerro community's roadways is presented in the Draft EIR; and, this analysis correctly assumes that the proposed Lower Village would result in the addition of 990 ADT. Even with addition of the traffic generated by the proposed project, all of the roadway segments in the Del Cerro community, including the segments along Adobe Falls Road, would operate at acceptable levels of service, and the proposed project would not result in significant impacts. (DEIR pp. 3.14-69; 3.14-81.)</p> <p>As to the comment's concern for the relationship between the "uniquely sloped grade" on Adobe Falls Road and traffic impacts, this factor was considered in classifying the road's capacity and subsequently analyzing project related impacts. (DEIR p. 3.14-12; see also General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.)</p>	
Comment I-34-5	Comments from Joanna Myers, 7/23/2007	Response

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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 seers as they propose increases of more than 100%, and this certainly constitutes a significant adverse impact to local residents, pedestrians and bicyclists.

Insert I20-2 once final.

### Comment I-34-6

### Comments from Joanna Myers, 7/23/2007

### Response

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.

The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; an LOS exceeding "D," (i.e., LOS E) is considered by the City to be operating at deficient conditions. Therefore, at LOS C (or D) operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS D, based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.

With respect to the safety of residents and schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study is to focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel school. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

### Comment I-34-7

### Comments from Joanna Myers, 7/23/2007

### Response

I ask that you acknowledge the falsehoods and oversights of the EIR, and respond to the objections of the community, city officials and the Fie Department who oppose this plan, by finding an alternative and more suitable location for your high density condominium development effort.

Please see Section 5.0, Alternatives, of the Draft EIR for discussion regarding the various alternate locations considered for campus expansion. (DEIR pp. 5.0-3 to 5.0-4.) Because SDSU's cost basis in the Adobe Falls Faculty/Staff Housing proposed project site is low, SDSU is better able to provide

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affordable housing to faculty/staff and thereby achieve one of the primary project objectives. An alternative project location would not realize this objective.

To the extent the comment expresses an opinion suggesting that the density planned for Adobe Falls Faculty/Staff Housing is too high, that opinion is incorrect. The proposed project would result in a density of 11.2 units per acre, which falls within the definition of the Navajo Community Plan's "low-medium" density parameters of 10-14 units per acre. (DEIR p. 3.8-25.)

Comment I-35-1	Comments from Susan Wood, 7/23/2007	Response
<p>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.</p> <p>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.</p>	<p>SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts to the community that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA.</p> <p>In addition, the Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.</p>	

Comment I-35-2	Comments from Susan Wood, 7/23/2007	Response
<p>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.</p> <p>Thank you for your consideration to these concerns.</p>		<p>Preliminarily, restoration of the Adobe Falls, and the development of any trails on the Adobe Falls site, would not occur until development of the Lower Village. (See, e.g., Final EIR Mitigation Measure CR-4.) The Lower Village will be developed over the long-term, sometime beyond the year 2012, with no commencement date presently planned. (Draft EIR p. 1.0-36.) Accordingly, the Lower Village site was analyzed in the EIR at the program level of review, and development of the site will undergo additional CEQA analysis prior to project construction. During subsequent development phases, the Lower Village trail system will be designed, and any/all impacts associated with the trails will be assessed. However, it is presently contemplated that the trails to be developed on the Adobe Falls Lower Village site will be developed for use</p>



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by the residents of the Adobe Falls Faculty/Staff Housing community, not for use by the general public. Therefore, with resident use of the trails, no additional vehicle trips would be generated. Moreover, even if the trails were available for public use, any vehicle traffic generated would be relatively minimal.

Comment I-36-1	Comments from John Hale, 7/24/2007	Response
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.	<p>With respect to the comment that the proposed Adobe Falls Faculty/Staff Housing would be out of character with the existing development, the proposed project would provide multi-family housing at a density consistent with the Community Plan, in an area surrounded by other single- and multi-family residences. Accordingly, there is no basis for the comment.</p> <p>The comment questions whether the existing infrastructure has adequate capacity to accommodate the proposed project. This comment addresses general subject areas, which received extensive analysis in the Draft EIR. (See, e.g., Section 3.13, Public Utilities and Service Systems; Section 3.14, Transportation/Circulation and Parking.) As this comment does not raise any specific issue regarding that analysis, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.</p> <p>Also, there is no evidence to suggest that development of the proposed Adobe Falls Faculty/Staff Housing project would have a negative effect on surrounding property values. As discussed in the Draft EIR, the proposed project would provide multi-family housing in an area that is presently surrounded by single- and multi-family dwelling units. This project component also would include a swimming pool, a 3,600 gross square-foot ("GSF") community center, and recreation areas for resident use only.</p>	

Comment I-36-2	Comments from John Hale, 7/24/2007	Response
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 DT of 200 for cul-de-sacs (San Diego's Street Design Manual, pg 118). The Draft FJR incorrectly labels Adobe Falls Road a "Residential Local Street" capable of handling 1,500 ADT (Draft EIR for the SDSU 2007 Campus Master	SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadways without resulting in a significant impact under CEQA.	

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Plan Revision, Section 3.14, pg. 12). 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 Road (Draft EIR for the SDSU 2007 Campus Master Plan Revision, Section 3.14, Figure 8-4) to be unfeasible.

The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Further, the "steep grade" on Adobe Falls Road was considered in classifying the road's capacity and subsequently analyzing project related impacts. (DEIR p. 3.14-12.) Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject. Additionally, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) Although the focus of the study will be on the vicinity of the elementary schools near the Del Cerro Boulevard/College Avenue intersection, the area of the Adobe Falls Road grade can be addressed as well. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

The Lower Village component of the Adobe Falls Faculty/Staff Housing is actually only projected to result in 990 ADT. The 1040 ADT figure identified in Figure 8-4 is a typographical error, and this error will be corrected in the Final EIR section entitled "Revised Draft EIR Pages." The correct figure, and the figure upon which the Draft EIR's analysis appropriately relies, is 990 ADT. (DEIR p. 3.14-37.) As noted above, the addition of 990 ADT is not projected to result in a significant impact as adequate capacity presently exists to accommodate this increase. [Confirm with O4-3 once final.]

Comment I-36-3	Comments from John Hale, 7/24/2007	Response
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 trips (Draft EIR for the SDSU 2007 Campus Master Plan Revision, Section 3.14, Table 3.14-9), a number which would be even more severely impacted by the increased traffic volume from the proposed housing development.		The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; a LOS exceeding "D" (i.e., LOS E) is considered by the City to be operating at deficient conditions. Therefore, at LOS C (or D) operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS D, based on the City's thresholds, the project would not result

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in significant impacts on Del Cerro Boulevard.

Comment I-36-4	Comments from John Hale, 7/24/2007	Response
<p>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 main the Adobe Falls Historical Landmark (Appendix E.), deplete cultural artifacts such 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 &amp; 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"</p>	<p>The comment addresses general subject areas, which received extensive analysis in the Draft EIR. (Section 3.3, Biological Resources; 3.4, Cultural Resources; 3.7, Hydrology and Water Quality; and Section 3.11, Paleontological Resources.) The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.</p>	
Comment I-36-5	Comments from John Hale,	Response
<p>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" (Draft EIR for the SDSU 2007 Campus Master Plan Revision, Executive Summary, Section VIII.c), described in the Draft EIR for the SDSU 2007 Campus Master Plan Revision. I encourage the CSU system in his 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 roster increased FTES levels through more efficient use of existing physical resources (Draft EIR for the SDSU 2007 Campus Master Plan Revision, Appendix O, pg. 3). SDSU is , almost a ghost town in the summer months, a welcome respite for nearby residents bur an underutilized resource waiting to be tapped by students desirous of graduating within a reasonable time-frame.</p>	<p>With respect to the Adobe Falls landmark, the property is owned by Caltrans and is not part of the proposed project site. (Draft EIR p. 3.4-9.) Nevertheless the Draft EIR proposes mitigation that would require SDSU to take steps to minimize any potential indirect effects to the site (Mitigation Measure CR-1), and the Final EIR will include an additional measure that will require SDSU to assist in the restoration of the site (Mitigation Measure CR-4).</p> <p>The propriety of securing off campus alternative locations for SDSU expansion is considered in Section 5.0, Alternatives, of the Draft EIR. (DEIR pp. 5.4-24 to 5.0-30.) The Draft EIR notes that SDSU has developed and will continue to develop off campus centers, the use of academic technology, and summer term enrollment in an effort to serve the increasing student demand for higher education in locations other than the SDSU main San Diego campus. However, the Draft EIR concludes that reliance on these alternatives will not enable SDSU to meet the projected future student enrollment demands or the primary project objectives.</p> <p>With respect to the comment in support of the "No Adobe Falls Alternative," the comment will be included as part of the record and made available to San</p>	

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Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.

Comment I-37-1	Comments from Robert T. Glynn, 7/25/2007	Response
<p>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.</p>	<p>CSU/SDSU acknowledges the commentator's opposition to the proposed project, specifically the Adobe Falls Faculty/ Staff Housing's use of alternate access through the Smoke Tree Condominium Residences. However, the commentator should note that the Smoke Tree access route for the Lower Village component of the Adobe Falls Faculty/Staff Housing was analyzed at the program level and as an alternate access route. (DEIR pp. 5.0-33 to 5.0-49.) The fact that the Draft EIR analyzed this at the program level means that additional environmental review and approval will be required before the Lower Village will be built out and/or access is secured through use of the Smoke Tree community's roads. Upon undertaking this additional environmental review, the roadway capacity of Smoke Tree's roads, the western portion of Adobe Falls Road, and Waring Road will be evaluated further and the proposed project's impacts will be further assessed.</p> <p>At the program level of review, the Draft EIR determined that buildout of the Lower Village may result in anywhere from 600 to 2,800 average daily trips. (DEIR p. 3.14-89.) A field review of the area and a review of area maps reveal that the two roads that will need to carry the majority of project-related traffic are Adobe Falls Road (west) and Waring Road. (DEIR p. 3.14-89.) Both roads have adequate capacity to accommodate the proposed project in addition to existing traffic. (DEIR p. 3.14-90.)</p>	
Comment I-38-1	Comments from Dan Geis, 7/25/2007	Response
<p>As a 16 year resident of the [ ] 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.</p> <p>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.</p>	<p>Preliminarily, under the proposed project, a maximum of 348 dwelling units, not 540, would be developed for faculty/staff housing on the Adobe Falls site. As stated in the Draft EIR, the Upper Village portion of the site would be developed in the near-term, following project approval, and would provide 48 townhomes. The Lower Village, which would be developed long-term, would include between 124 and 300 townhomes and/or condominiums. (DEIR p. 1.0-2.) Therefore, at most, the proposed project would result in the addition of 348 residential units to the Adobe Falls area. The 540 units are associated with the 2005 project, which has since been revised.</p> <p>To the extent the comment expresses an opinion suggesting that the density planned for Adobe Falls Faculty/Staff Housing is too high, that opinion is incorrect. The proposed project would result in a density of 11.2 units per</p>	

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acre, which falls within the definition of the Navajo Community Plan's "low-medium" density parameters of 10-14 units per acre. (DEIR p. 3.8-25.)

Additionally, SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Draft EIR Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadways without resulting in a significant impact under CEQA.

Please see Response to Comment I38-4, below, for discussion of the Del Cerro roadway classifications.

Comment I-38-2	Comments from Dan Geis, 7/25/2007	Response
<p>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?</p> <p>[ ] Our streets, neighborhood, and residents should not be required to shoulder the increased traffic burden that would be caused by this development.</p>	<p>The comment expresses an opinion suggesting that the "right thing" to do to alleviate traffic impacts would be to provide separate access to the Adobe Falls Faculty/Staff Housing via Interstate-8. This alternate access route is among those considered in Section 5.0 of the Draft EIR. (DEIR pp. 5.0-33 to 5.0-49.) The Draft EIR concludes that this alternative is infeasible, and that the only alternate access route that satisfies the project's development criteria and economic objectives is the alternate providing access to the Lower Village via the Smoketree condominium development (Alternate 1a).</p>	
Comment I-38-3	Comments from Dan Geis, 7/25/2007	Response
<p>*It is my understanding that:</p> <p>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.</p>	<p>With respect to the comment regarding the number of vehicle trips generated by the Lower Village component of the Adobe Falls Faculty/Staff Housing, the 1040 average daily trip ("ADT") figure identified in Figure 8-4 is a typographical error. The correct figure, and the figure upon which the Draft EIR's analysis appropriately relies, is 990 ADT. (DEIR p. 3.14-37.) Therefore, the reason that the Draft EIR contains the 1040 ADT figure only once is because the use of the figure was an error. (This error (i.e., the representation in Figure 8-4 that the proposed Lower Village would generate 1040 ADT) will be corrected in the Final EIR section entitled "Revised Draft EIR Pages.")</p> <p>An analysis of the potential traffic impacts to the Del Cerro community's roadways is presented in the Draft EIR, Section 3.14. The Draft EIR concludes that the addition of project traffic would not result in a potentially significant impact to the Del Cerro community's roadways.</p>	

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Additionally, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) Although the focus of the study will be on the vicinity of the elementary schools near the Del Cerro Boulevard/College Avenue intersection, the area of the Adobe Falls Road grade can be addressed as well. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Comment I-38-4	Comments from Dan Geis, 7/25/2007	Response
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.	The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.	
Comment I-38-5	Comments from Dan Geis, 7/25/2007	Response
3. The EIR 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	The EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.	
Comment I-38-6	Comments from Dan Geis, 7/25/2007	Response

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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.

The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; a LOS exceeding "D," (i.e., LOS "E") is considered by the City to be operating at deficient conditions. Therefore, at LOS "C" (or "D") operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS "D," based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.

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### Comment I-39-1

### Comments from Anthony Colangelo, 7/16/2007

### Response

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.

SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. In fact, the steep grade on Adobe Falls Road was considered in classifying the road's capacity and subsequently analyzing project related impacts. (DEIR p. 3.14-12.) Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA.

The Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) Although the focus of the study will be on the vicinity of the elementary schools near the Del Cerro Boulevard/College Avenue intersection, the area of the Adobe Falls Road grade can be addressed as well. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

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### Comment I-39-2

### Comments from Anthony Colangelo, 7/16/2007

### Response

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

With respect to the number of vehicle trips generated by the Lower Village component of the Adobe Falls Faculty/Staff Housing, the 1040 average daily trip ("ADT") figure identified in Figure 8-4 is a typographical error. The correct figure, and the figure upon which the Draft EIR's analysis appropriately relies,

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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.

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.

is 990 ADT. (DEIR p. 3.14-37.) Therefore, the reason that the Draft EIR contains the 1040 figure only once is because the use of the figure was an error. (This error (i.e., the representation in Figure 8-4 that the proposed Lower Village would generate 1040 ADT) will be corrected in the Final EIR section entitled "Revised Draft EIR Pages.")

A full and thorough analysis of the impacts to the Del Cerro community's roadways is presented in the Draft EIR; and, this analysis correctly assumes that the proposed Lower Village would result in the addition of 990 ADT. And, as mentioned in Response to Comment I39-2, Adobe Falls Road has sufficient capacity to accommodate the addition of 990 ADT, and would continue to operate at an acceptable level of service following project buildout.

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### Comment I-39-3

### Comments from Anthony Colangelo, 7/16/2007

### Response

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.

The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.

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### Comment I-39-4

### Comments from Anthony Colangelo, 7/16/2007

### Response

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.

The EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.

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### Comment I-39-5

### Comments from Anthony Colangelo, 7/16/2007

### Response

In the midst of all this are two schools. Hearst Elementary and Temple Emanu-

With respect to the safety of schoolchildren in the area of the two elementary



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EI: 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 1-8 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).

schools, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study is to focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel school. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Comment I-39-6	Comments from Anthony Colangelo, 7/16/2007	Response
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.	To the extent that the comment expresses an opinion regarding the propriety of purchasing additional property upon which to further the campus expansion objectives, please see Section 5.0, Alternatives, of the Draft EIR for discussion relating to the consideration of off-campus alternative locations. (DEIR pp. 5.0-3 to 5.0-4.) In sum, because SDSU's cost basis in the Adobe Falls Faculty/Staff Housing property is already low (in light of its long-term ownership of the property), only the proposed site can further the project's objective to provide affordable housing for faculty and staff.	
	In addition, please note that Section 3.3, Biological Resources, of the Draft EIR concludes that no significant impacts to sensitive species will result from implementation of the proposed project.	

Comment I-39-7	Comments from Anthony Colangelo, 7/16/2007	Response
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.	Preliminarily, restoration of the Adobe Falls, and the development of any trails on the Adobe Falls site, would not occur until development of the Lower Village. (See, e.g., Final EIR Mitigation Measure CR-4.) The Lower Village will be developed over the long-term, sometime beyond the year 2012, with no commencement date presently planned. (Draft EIR p. 1.0-36.) Accordingly, the Lower Village site was analyzed in the EIR at the program level of review, and development of the site will undergo additional CEQA analysis prior to project construction. During subsequent development phases, the Lower Village trail system will be designed, and any/all impacts associated with the trails will be assessed. However, it is presently contemplated that the trails to be developed on the Adobe Falls Lower Village site will be developed for use by the residents of the Adobe Falls Faculty/Staff Housing community, not for use by the general public. Therefore, with resident use of the trails, no	

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additional vehicle trips would be generated. Moreover, even if the trails were available for public use, any vehicle traffic generated would be relatively minimal.

Comment I-39-8	Comments from Anthony Colangelo, 7/16/2007	Response
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.	Please see response to comment O4-2 in the Del Cerro Action Council letter, dated July 27, 2007.	
Comment I-39-9	Comments from Anthony Colangelo, 7/16/2007	Response
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 because it adversely impacts the safety of residents and schoolchildren attending the schools at Phoebe Hearst and Temple Emanu-El.	<p>The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; a LOS exceeding "D," (i.e., LOS "E") is considered by the City to be operating at deficient conditions. Therefore, at LOS "C" (or "D") operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS "D," based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.</p> <p>Please see Response to Comment I39-5, above, for information regarding the proposed project's safety impacts.</p>	
Comment I-39-10	Comments from Anthony Colangelo,	Response
I have also suspended my membership in the SDSU Alumni Association until this EIR is acceptable to us Del Cerro residents.	The comment is noted. No further response is required given that the document does not address or question the content of the Draft EIR.	
Comment I-40-1	Comments from Shelley Stone,	Response
<p>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.</p> <p>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 /and is undeniable. From my backyard I can see wild rabbits, a beautiful array of reptiles, and so many colorful birds @ "here will these animals go?</p>	Section 3.3, Biological Resources, of the Draft EIR analyzes the proposed project's potential impacts on sensitive species, including vegetation, flora, wetlands, wildlife, and wildlife habitat. The Draft EIR's analysis is based upon a biological resources impact report prepared by Dudek that considered relevant literature and the results of field reconnaissance when assessing the extent of project impacts. The Draft EIR concludes that the proposed project, upon implementation of the recommended mitigation measures, will result in a less than significant impact to biological resources.	

## Responses to Comments Report

### Comment I-40-2

### Comments from Shelley Stone,

### Response

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 nine!: 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 my home 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.

The comment is incorrect regarding the number and proposed use of the Adobe Falls housing. The project proposes a maximum of 348 dwelling units (not 540), and the use proposed for the Adobe Falls Faculty/Staff Housing is occupancy by faculty and staff, not retired faculty. The comment is confusing the project currently proposed with the former 2005 project, which has been revised.

In addition, the comment is also incorrect with regards to its claim that the proposed project would result in "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." As discussed in Response to Comment I40-1, the proposed project will have a less than significant impact on biological resources. Also, the proposed project would not significantly impact the Adobe Falls or Adobe Creek. (DEIR p. 3.4-22.)

SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA.

With regards to the comment's proposal of various alternatives in lieu of the Adobe Falls Faculty/Staff Housing, please see Section 5.0, Alternatives, of the Draft EIR. As discussed in this section, the Draft EIR has considered the "No Adobe Falls Faculty/Staff Housing Alternative," under which the Adobe Falls Faculty/Staff Housing component of the proposed project would not be master-planned. In addition, the Draft EIR also analyzed the related "50% Adobe Falls Faculty/Staff Housing Alternative," under which half of the proposed number of residential units would be built out. However, while each of these alternatives would attain many of the proposed project's academic goals and objectives, neither would attain the project's objective of providing affordable housing for faculty and staff. (DEIR pp. 5.0-16 to 5.0-22.)

Finally, the Draft EIR also considers the possibility of securing alternative locations for the proposed project's Adobe Falls Faculty/Staff Housing in Section 5.0. (DEIR pp. 5.0-3 to 5.0-4.) However, because SDSU's cost basis

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in the Adobe Falls Faculty/Staff Housing property is already low (in light of its long-term ownership of the property), only the proposed site can further the project's objective to provide affordable housing for faculty and staff.

Comment I-40-3	Comments from Shelley Stone,	Response
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 Justin; adding traffic for 500 more cars? $700 + 1,500 = 2,200$ cars on a road that is already listed as being full capacity?		<p>The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.</p> <p>Further, as discussed in Section 3.14, Transportation/Circulation and Parking, of the Draft EIR, with the addition of project traffic, all of the roadway segments in the Del Cerro community would operate within the acceptable capacity limits, and within the City's assigned acceptable levels of service. (DEIR p. 3.14-69.) Therefore, even if the project would substantially increase traffic relative to the existing traffic load, the roadways have sufficient available capacity to accommodate the increased traffic and the project would not result in a significant impact within the meaning of CEQA.</p>
Comment I-40-4	Comments from Shelley Stone,	Response
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.		Please see Response to Comment I40-1 above. San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.
Comment I-41-1	Comments from Carol and Joy Klinger, 7/23/2007	Response
<p>After reading the Draft EIR, I have the following concerns regarding the Faculty/Staff Housing proposed in Adobe falls.</p> <p>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.</p>		As set forth in the project description, the Adobe Falls Faculty/Staff Housing is designed for the exclusive use of faculty and staff. (DEIR pp. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.) Further, as required by CEQA, the environmental analysis set forth in the Draft EIR is premised on this very project description. Any amendment to this description (e.g., converting faculty/staff housing to university student housing) that would alter the environmental impact analysis

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may warrant further environmental review. Therefore, the Draft EIR itself already provides assurances that the Adobe Falls Faculty/Staff Housing will be used only by faculty and staff.

Comment I-41-2	Comments from Carol and Joy Klinger, 7/23/2007	Response
<p>As far as accessing Smoke Tree's private driveways in the second phase, I am opposed to that notion for the following reasons:</p> <p>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.</p> <p>Our fire lanes are privately funded and we simply cannot afford to repave more often than we already do for our own traffic needs.</p>	<p>CSU/SDSU acknowledges the commentator's opposition to the proposed project, specifically the Adobe Falls Faculty/ Staff Housing's use of alternate access through the Smoke Tree Condominium Residences. However, the commentator should note that the Smoke Tree access route for the Lower Village component of the Adobe Falls Faculty/Staff Housing was analyzed at the program level and as an alternate access route. (DEIR pp. 5.0-33 to 5.0-49.) The fact that the Draft EIR analyzed this at the program level means that additional environmental review and approval will be required before the Lower Village will be built out and/or access is secured through use of the Smoke Tree community's roads. Upon undertaking this additional environmental review, the roadway capacity of Smoke Tree's roads, the western portion of Adobe Falls Road, and Waring Road will be further evaluated and the proposed project's impacts will be further assessed.</p> <p>At the program level of review, the Draft EIR determined that buildout of the Lower Village may result in anywhere from 600 to 2,800 average daily trips. (DEIR p. 3.14-89.) A field review of the area and a review of area maps reveal that the two roads that will need to carry the majority of project-related traffic are Adobe Falls Road (west) and Waring Road. (DEIR p. 3.14-89.) Both roads have adequate capacity to accommodate the proposed project in addition to existing traffic. (DEIR p. 3.14-90.)</p>	
Comment I-41-3	Comments from Carol and Joy Klinger, 7/23/2007	Response
<p>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.</p>	<p>The western segment of Adobe Falls Road is classified as a 2-lane collector roadway pursuant to the City of San Diego's Street Design Manual. Therefore, the total roadway capacity is 6,500 average daily trips ("ADT"). An existing traffic count was conducted on this western segment of Adobe Falls Road, which revealed an existing ADT count of 3,690. Therefore, the segment can accommodate approximately an additional 2,800 ADT and still operate at an acceptable level of service. Since the proposed project is estimated to only add a maximum of 2,800 ADT to this segment of Adobe Falls Road, the impact would be less than significant. (DEIR pp. 3.14-89 to 3.14-90.)</p> <p>With regards to the "Levanto condominium project," this related project was considered in the cumulative impacts analysis. At some point during the</p>	

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development process, the Levanto condominium project changed names and became known as the William Lyons Homes - Grantville project. (DEIR p. 2.0-4.) As provided in the Draft EIR, the traffic impacts analysis considered the cumulative traffic impacts associated with pending (such as the William Lyons Home - Grantville project) and probable future projects both in the near-term and horizon year analysis. (DEIR p. 3.14-99.)

The other project referenced in the comment appears to be the 36-unit Waring Gardens Apartment expansion project, located at 5320-5340 Adobe Falls Road. This project, according to City of San Diego staff, is presently "on hold." In the event that this expansion project goes forward, any additional vehicle trips that may be generated along Adobe Falls Road, which would presumably be relatively limited given the small size of the expansion project, would be accounted for in the project-level traffic impact analysis for the Lower Village component of the Adobe Falls Faculty/Staff Housing.

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### Comment I-41-4

### Comments from Carol and Joy Klinger, 7/23/2007

### Response

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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.

As previously discussed in Response to Comment I41-2, above, in the event the Smoke Tree alternate access route is selected for further consideration, additional environmental review will be conducted with respect to all impact categories, including air quality and aesthetics.

With regards to the potential for visual quality deterioration, the Draft EIR notes that, depending on the location of the access route through the Smoke Tree residences, construction may result in large retaining walls and concrete structures, which may result in visual impacts. (DEIR pp. 5.0-39 to 5.0-40.) These potential visual impacts will be studied in greater detail when project level review is undertaken for the Lower Village component of the Adobe Falls Faculty/Staff Housing. The comment's concern for air quality deterioration is also noted; however, construction related emissions (e.g., those that would result from building a bridge over the flood control channels) are not analyzed until project level review.

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### Comment I-41-5

### Comments from Carol and Joy Klinger,

### Response

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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.

The Draft EIR notes that the Alvarado Creek flows through the proposed site for the Adobe Falls Faculty/Staff Housing, generally from east to west, entering the site via a culvert at the southeastern end, and exiting at the northwest end via a manmade concrete channel -- this northwest exit is near the Smoke Tree residences. (DEIR p. 3.7-10.) The Draft EIR further provides that development of the Adobe Falls Faculty/Staff Housing site would reduce infiltration as a result of an increase in impervious surfaces in

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presently undeveloped areas that either drain to Alvarado Creek or naturally percolate into the soil. The increase in runoff volumes for each storm event represents a potentially significant impact. (DEIR p. 3.7-16.) In response, the Draft EIR includes Mitigation Measure HWQ-2, which requires SDSU to conduct a detailed site-specific hydrologic analysis of the proposed site in order to further assess the effects of the proposed project on the flood plain and, based on that analysis, determine whether on-site detention facilities are needed. This hydrologic analysis would need to occur prior to the preparation of final design plans for the Adobe Falls Faculty/Staff Housing. (DEIR p. 3.7-29.)

Comment I-42-1	Comments from Mary Manzella,	Response
<p>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.</p> <p>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.</p>		<p>SDSU acknowledges the community's concerns with respect to the potential traffic impacts to the Del Cerro community that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA.</p> <p>With respect to the safety of Del Cerro community residents, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.</p>
Comment I-42-2	Comments from Mary Manzella,	Response
<p>Specifically, nowhere in the Environmental Impact Report does SDSU explain (1) the impact of the "1040 Average Daily Trips" generated on Adobe Falls Road.</p>		<p>The Draft EIR, in Figure 8-4, represents that the number of vehicle trips generated by the Lower Village component of the Adobe Falls Faculty/Staff Housing will be 1040 average daily trips ("ADT"). This figure is a typographical error. The correct figure, and the figure upon which the Draft EIR's analysis appropriately relies, is 990 ADT. (DEIR p. 3.14-37.) Therefore, the reason that the Draft EIR contains the 1040 ADT figure only once is</p>

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because the use of the figure was an error. (This error (i.e., the representation in Figure 8-4 that the proposed Lower Village would generate 1040 ADT) will be corrected in the Final EIR section entitled "Revised Draft EIR Pages.")

A full and thorough analysis of the impacts to the Del Cerro community's roadways is presented in the Draft EIR; and, this analysis correctly assumes that the proposed Lower Village would result in the addition of 990 ADT. This analysis also concludes that the proposed project's impacts to the Del Cerro community's roadways will be less than significant.

<b>Comment I-42-3</b>	<b>Comments from Mary Manzella,</b>	<b>Response</b>
(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.		The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.
<b>Comment I-42-4</b>	<b>Comments from Mary Manzella,</b>	<b>Response</b>
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".		The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.
		Also, please see Response to Comment I42-3 above.
<b>Comment I-43-1</b>	<b>Comments from Barbara Morton, 7/24/2007</b>	<b>Response</b>
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		The proposed 2007 Campus Master Plan Revision provides for the near-term and long-term development of an additional 2,976 on-campus student housing beds intended primarily to address the community's concern with nuisance rentals, i.e., mini-dorms. The EIR determined that the projected increase in the availability of on-campus and nearby multi-family campus housing (not mini-dorms) over the next 15-20 years would accommodate 50% of the future student population, an amount likely to exceed student housing demand. (Draft EIR p. 3.12-19.)



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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 me 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, 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,

The effects of the proposed Campus Master Plan relative to nuisance rentals is addressed in Draft EIR Section 3.12, Population and Housing. (See Draft EIR pp. 3.12-20 to 24.) As the section notes, SDSU is working with the City of San Diego on a number of existing and proposed measures and programs intended to curb the associated effects of nuisance rentals. Please see General Response 2, Population and Housing Related Matters.

The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not raise any specific issues relative to the adequacy of the Draft EIR, no further response can be provided or is required.

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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 prosper 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 all acts 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

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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 ate 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, morning 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 out quality of life and devaluing our homes.

Also, if it is such a hardship on the students to find "affordable" housing, perhaps they could for go 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 solution needs to focus on where students war to live. Dorm rooms are nor the solution long term.

According to a SDSU's professor, students do not want to live under the

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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.

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.

Comment I-43-2	Comments from Barbara Morton, 7/24/2007	Response
<p>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.</p> <p>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.</p>		<p>The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.</p>
Comment I-43-3	Comments from Barbara Morton, 7/24/2007	Response
<p>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</p>		<p>The Draft EIR analyzes the impacts of the proposed Campus Master Plan Revision, including the development of the Alvarado Campus, in Section 3.14, Transportation/Circulation and Parking. Mitigation is proposed that would reduce the impacts caused by the additional traffic. The comment does not raise any specific issue regarding that analysis and, therefore, no more</p>

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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, 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?

specific response can be provided or is required.

With respect to on-street parking on Alvarado Road, it is not certain that the removal of on-street parking would be necessary to widen Alvarado Road. Mitigation measures TCP-7 and TCP-8, which provide mitigation for the project's contribution to the forecast conditions on Alvarado Road, require that SDSU contribute to the City of San Diego its fair-share of the costs to widen Alvarado Road, from E. Campus Drive to Reservoir Drive to 70th Street. The mitigation measures contemplate only that Alvarado Road will be widened, and they do not require necessarily the removal of on-street parking. Implementation of the necessary roadway improvements is to be accomplished by the City of San Diego; neither SDSU nor CSU has the authority to conduct roadway improvements off-campus, on land it does not own. (City of Marina, 39 Cal.4th at 359.)

San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.

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### Comment I-43-4

### Comments from Barbara Morton, 7/24/2007

### Response

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?

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.

Alvarado Hospital was recently purchased from Tenet Healthcare by a group not affiliated with SDSU. Any comments regarding elimination of the hospital are speculative and not related to the proposed Campus Master Plan Revision.

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### Comment I-43-5

### Comments from Barbara Morton, 7/24/2007

### Response

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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.

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?

SDSU currently has a need for nearby transient housing for guests of the university, visiting scholars, conference attendees, and recruiting faculty and staff. The closest accommodations are 2-3 miles away along I-8. Additionally, the SDSU Hospitality and Tourism Management school would utilize the hotel for internships and training opportunities.

San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.

Comment I-43-6	Comments from Barbara Morton, 7/24/2007	Response
<p>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 buildings going to be used for? Of what value are they if teaching is via the Web? Is this a case of how nice I will look? 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.</p> <p>It is time for SDSU to be decentralized with satellite campuses in areas with less density and zoning for single-family homes.</p>	<p>As discussed in Draft EIR Section 5.4, Institutional Alternatives, SDSU has in the past, and continues to, explore the establishment of off-campus centers in both the South Bay and East County San Diego regions. Included within this effort, SDSU has been in intermittent talks with Chula Vista officials about developing a satellite campus in that city for many years. However, as discussed further in Section 5.4, it is not presently feasible from a student demand perspective and, consequently, cost perspective, to develop a South Bay alternative. Furthermore, also as discussed in Section 5.4, aside from the feasibility of establishing another university in the greater San Diego region, 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, rather than avoiding or lessening the significant impacts of the proposed project."</p> <p>As in the past, when opportunity is presented and/or when enrollment demand demonstrates the need to provide off-site instruction and remote facilities, SDSU will make every effort to respond to the call.</p>	
Comment I-43-7	Comments from Barbara Morton, 7/24/2007	Response
<p>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.</p>	<p>The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to</p>	

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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.

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.

a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.

Comment I-44-1	Comments from Ronald A. Thiel, 7/24/2007	Response
<p>These are comments on the draft SDSU Master Plan EIR, dated June 2007</p> <p>SDSU has become a major nuisance to its neighbors.</p> <p>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 ere 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!</p>		<p>The traffic impacts of the proposed project are extensively analyzed in Section 3.14, Transportation/Circulation and Parking, of the Draft EIR. The Draft EIR concludes that with implementation of the proposed mitigation measures, all identified potentially significant impacts would be mitigated to a level below significant, except for the impacts to College Avenue/Interstate 8 Interchange, Montezuma Road (between Fairmount Avenue to Collwood Blvd.), Alvarado Road (between E. Campus Drive to 70th Street), and Interstate 8 (between Fairmount Avenue to Fletcher Parkway). Impacts to these locations only would remain significant and unavoidable.</p> <p>The Draft EIR proposes mitigation measures that would require SDSU to make a fair-share contribution to the City of San Diego in order to improve the infrastructure in the campus area. Under CEQA, SDSU/CSU is not required to pay more than is necessary to mitigate the significant impacts of the</p>

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proposed project; further, CEQA requires that the mitigation measures be "roughly proportional" to the project generated impacts. (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341, 361-362.) SDSU's percentage contributions to the improvements required are set forth in the Draft EIR. (DEIR pp. 3.14-109 to 3.14-110.) These percentages were calculated according to formula routinely used by the City of San Diego to assess fair-share contributions.

Comment I-44-2	Comments from Ronald A. Thiel, 7/24/2007	Response
<p>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.</p>		<p>For the subject intersection, the Draft EIR proposes mitigation measures TCP-3, and TCP-15, which require that SDSU contribute to the City of San Diego its fair share of the costs to provide an additional (third) northbound through lane, and, an additional dedicated left-turn lane on both the eastbound and westbound approaches. (Draft EIR pp. 3.14-102, 3.14-104.) The subject mitigation would reduce the project's impacts at the intersection to a level below significant. The comment that the "real problem" is the referenced switchback is the opinion of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.</p>
Comment I-44-3	Comments from Ronald A. Thiel, 7/24/2007	Response
<p>Figure 84 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% of 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. 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</p>	<p>With respect to the number of vehicle trips generated by the Lower Village component of the Adobe Falls Faculty/Staff Housing, the 1040 average daily trip ("ADT") figure identified in Figure 8-4 is a typographical error. The correct figure, and the figure upon which the Draft EIR's analysis appropriately relies, is 990 ADT. (DEIR p. 3.14-37.) This error (i.e., the representation in Figure 8-4 that the proposed Lower Village would generate 1040 ADT) will be corrected in the Final EIR section entitled "Revised Draft EIR Pages."</p> <p>A full and thorough analysis of the impacts to the Del Cerro community's roadways is presented in the Draft EIR; and, this analysis correctly assumes that the proposed Lower Village would result in the addition of 990 ADT. This analysis further concludes that the Del Cerro community's roadways have adequate capacity to accommodate the proposed project's estimated ADT, and that no significant impacts would result.</p> <p>As to the commentor's opinion that certain traffic distribution patterns are more realistic and likely, the trip distribution and assignment for the Adobe Falls Faculty/Staff Housing component is discussed at Draft EIR pages 3.14-39 to 43. The distribution and assignments are based on reliable modeling</p>	



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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.

assumptions and determinations made by professional traffic engineers.

Finally, the comment incorrectly states that the Del Cerro community's roadways are limited to a 700 ADT rating -- a 1500 ADT rating, in fact, is applicable to these roadways. The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.

Comment I-44-4	Comments from Ronald A. Thiel, 7/24/2007	Response
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.	<p>As discussed in the response to comment I44-3, above, the referenced "error" portrayed an ADT level greater than the actual levels and, therefore, was not in SDSU's favor, as the comment contends. Also as noted, the error was typographical only; the correct ADT was utilized in the analysis.</p> <p>With respect to traffic conditions on Del Cerro Boulevard, the 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; a LOS exceeding "D," (i.e., LOS "E") is considered by the City to be operating at deficient conditions. Therefore, at LOS "C" (or "D") operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS "D," based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.</p> <p>Also, as discussed in Draft EIR Section 3.14, the proposed Adobe Falls Faculty/Staff Housing project component would not result in significant impacts relating to traffic and, therefore, the additional traffic associated with the proposed project would not result in a significant impact to emergency medical service access. (DEIR p. 3.14-98.) Additionally, as discussed in Draft EIR Section 3.13, Public Utilities and Services Systems, emergency response vehicles have the right-of-way and are exempted from rules of the road in emergency situations. Therefore, any surrounding traffic that would be on the roadways must yield the right-of-way and immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and stop until the emergency vehicle has passed. (DEIR pp. 3.13-28 to 3.13-29.)</p>	

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Comment I-44-5	Comments from Ronald A. Thiel, 7/24/2007	Response
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".	As set forth in the Draft EIR Project Description, the Adobe Falls Faculty/Staff Housing is designed for the exclusive use of faculty and staff. (DEIR pp. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.) The environmental analysis set forth in the Draft EIR is premised on this project description. Any amendment to this description (e.g., converting faculty/staff housing to university student housing) that would alter the environmental impact analysis may warrant the preparation of further environmental review. Therefore, the Draft EIR includes inherent restrictions.  To the extent the commentator is looking for restrictions such as deed restrictions, those restrictions would be developed outside of the environmental review process, during the latter phases of project development.	
Comment I-44-6	Comments from Ronald A. Thiel, 7/24/2007	Response
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.	SDSU's mitigation obligation under CEQA is to contribute its fair-share to the City of San Diego, which is the entity with jurisdiction over the subject roadways. The City of San Diego is responsible for collecting the funds and ultimately implementing the subject roadway improvements.	
Comment I-44-7	Comments from Ronald A. Thiel, 7/24/2007	Response
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.	There is no evidence to suggest that development of the proposed Adobe Falls Faculty/Staff Housing project would have a negative effect on surrounding property values. As discussed in the Draft EIR, the proposed project would be compatible with the surrounding neighborhood as it would provide multi-family housing in an area that is presently surrounded by single- and multi-family dwelling units.	
Comment I-45-1	Comments from John and Pamela Gray, 7/24/2007	Response
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	SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle	

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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.

capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA. Accordingly, no roadway improvement mitigation is required.

However, the EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (Draft EIR p. 3.14-99.) In response, the EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (Draft EIR p. 3.14-107.) Although the focus of the study will be on the vicinity of the elementary schools near the Del Cerro Boulevard/College Avenue intersection, the area of the Adobe Falls Road grade can be addressed as well. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

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### Comment I-45-2

### Comments from John and Pamela Gray, 7/24/2007

### Response

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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)

As noted in response to comment I45-1 above, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Also, to mitigate the proposed project's impacts at the College Avenue/Del Cerro Boulevard intersection, the Draft EIR includes mitigation measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the funds needed to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-102.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay.

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(See DEIR p. 3.14-114.) Therefore, the impact to this intersection would be less than significant.

<b>Comment I-45-3</b>	<b>Comments from John and Pamela Gray, 7/24/2007</b>	<b>Response</b>
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.	The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.	
<b>Comment I-45-4</b>	<b>Comments from John and Pamela Gray, 7/24/2007</b>	<b>Response</b>
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.	San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
<b>Comment I-46-1</b>	<b>Comments from Douglas and Beverly Livingston, 7/24/2007</b>	<b>Response</b>
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.	The comment is an introduction to comments that follow. No further response is required.	
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 within the Adobe Falls Residential Village Master Plan and Environmental Impact Report.		
<b>Comment I-46-2</b>	<b>Comments from Douglas and Beverly Livingston, 7/24/2007</b>	<b>Response</b>
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.	Preliminarily, the proposed Adobe Falls Faculty/Staff Housing development does not exceed density allocations permitted by applicable land use plans. The proposed project would result in a density of 11.2 units per acre, which falls within the Navajo Community Plan's "low-medium" density parameters of 10-14 units per acre. (DEIR p. 3.8-25.)	
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	The Draft EIR analyzed a number of various alternate access routes for the Adobe Falls Faculty/Staff Housing in Section 5.0, Alternatives. This analysis was undertaken in response to concerns raised by the Del Cerro community regarding the increased traffic volumes. The Draft EIR identifies the five conceptual alternate access routes and related sub-routes that were	

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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.

considered, and analyzes the environmental constraints and feasibility of each. Based on the analysis, Alternate Access Route 1a, which would provide access in to and out of the Adobe Falls Faculty/Staff Housing Lower Village site via the Smoketree condominium development, would add the least amount of additional costs to project development, is the only alternate access route that meets the development criteria and economic objectives, and is the only financially feasible alternate access route. For these reasons, SDSU may further investigate the potential for reaching agreement to obtain access in to and out of the Adobe Falls Faculty/Staff Housing Lower Village via the Smoketree condominium development. This process would be done in conjunction with the future preparation of project-specific environmental analysis for the Adobe Falls Faculty/Staff Housing Lower Village. (DEIR pp. 5.0-33 to 5.0-49.)

Comment I-46-3	Comments from Douglas and Beverly Livingston, 7/24/2007	Response
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.	To mitigate the proposed project's impacts at the College Avenue/Del Cerro Boulevard intersection, the Draft EIR includes mitigation measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the funds needed to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-102.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (DEIR p. 3.14-114.) Under CEQA, SDSU/CSU is not required to pay more than is necessary to mitigate the significant impacts of the proposed project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341, 361-362.) As the comment notes, SDSU's fair-share contribution to the improvement is 5%, which was calculated according to the formula routinely used by the City of San Diego. (DEIR pp. 3.14-108 to 109.)	
	SDSU's mitigation obligation under CEQA is to contribute its fair-share to the City of San Diego, which is the entity with jurisdiction over the subject roadways. The City of San Diego is responsible for collecting the funds and ultimately implementing the subject roadway improvements.	
Comment I-46-4	Comments from Douglas and Beverly Livingston, 7/24/2007	Response
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	The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway	

## Responses to Comments Report

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.

conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.

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**Comment I-46-5****Comments from Douglas and Beverly Livingston, 7/24/2007****Response**

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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.

Thank you for your attention to these details within the Master Plan and Environmental Impact Report.

As set forth in the Draft EIR Project Description, the Adobe Falls Faculty/Staff Housing is designed for the exclusive use of faculty and staff. (DEIR pp. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.) The environmental analysis set forth in the Draft EIR is premised on this project description. Any amendment to this description (e.g., converting faculty/staff housing to university student housing) that would alter the environmental impact analysis may warrant the preparation of further environmental review. Therefore, the Draft EIR includes inherent restrictions.

To the extent the commentator is looking for restrictions such as deed restrictions, those restrictions would be developed outside of the environmental review process, during the latter phases of project development.

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**Comment I-47-1****Comments from Louis Galper, 7/25/2007****Response**

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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 schools definitely maxed out -- was not CSU San Marcos supposed to take the pressure of SDSU?

The comments express the opinions of the commentator and will be included as part of the record made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comments do not address or question the content of the Draft EIR, no further response can be provided or is required.

## Responses to Comments Report

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.

Comment I-48-1	Comments from Burton Nestor, 7/25/2007	Response
<p>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.</p> <p>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.</p> <p>I am glad that SDSU listened to the community's concerns and made this project a better fit for the community.</p>	<p>San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan Revision project.</p>	
Comment I-49-1	Comments from Thomas L. McKenzie, Ph.D, 7/25/2007	Response
<p>I am very concerned with the seemingly unmanageable increase in number of students that will be coming to campus and invading the neighborhoods.</p> <p>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 neighborhood brought on by too many students in mini-dorms (e.g., increased noise, traffic, litter, police action).</p> <p>During your deliberations, please consider: □-Taking more radical steps to reduce and control mini-dorms</p>	<p>The proposed 2007 Campus Master Plan Revision provides for the near-term and long-term development of an additional 2,976 on-campus student housing beds intended primarily to address the community's concern with nuisance rentals, i.e., mini-dorms.</p> <p>The EIR determined that the projected increase in the availability of on-campus and nearby multi-family campus housing (not mini-dorms) over the next 15-20 years would accommodate 50% of the future student population, an amount likely to exceed student housing demand. (Draft EIR p. 3.12-19.)</p> <p>The effects of the proposed Campus Master Plan relative to nuisance rentals is addressed in Draft EIR Section 3.12, Population and Housing. (See Draft EIR pp. 3.12-20 to 24.) As the section notes, SDSU is working with the City of San Diego on a number of existing and proposed measures and programs intended to curb the associated effects of nuisance rentals.</p>	
Comment I-49-2	Comments from Thomas L. McKenzie, Ph.D, 7/25/2007	Response

## Responses to Comments Report

-Increasing adequate on-campus housing on the east side of campus

The proposed 2007 Campus Master Plan Revision includes the development of the G Lot Residence Hall, and the reconstruction of the existing Olmeca and Maya Residence Halls. This will add approximately 2,000 student housing beds to the existing campus housing inventory on the (south) east side of campus. (Draft EIR pp. 1.0-49 to 54.) Additionally, the proposed Villa Alvarado Residence Hall Expansion would add an additional 200 student housing beds on the north east side of campus.

Comment I-49-3	Comments from Thomas L. McKenzie, Ph.D, 7/25/2007	Response
-Developing a quality bike trail system so students can actively safely bicycle to campus (include safe storage facilities on campus, too)	<p>The University has in place a comprehensive traffic and management plan for the campus. The programs promoted and information provided on the University's Parking and Transportation website include:</p> <ul style="list-style-type: none"> <li>•□Bus and trolley information with links to schedules;</li> <li>•□Tips on using alternative traffic routes and parking in areas of campus that are less congested;</li> <li>•□SDSU's "School Pool", a rideshare program which is free to all students, faculty and staff. Those interested, whether they drive or not, can apply online at <a href="http://www.ridelink.com">www.ridelink.com</a> and are paired with other SDSU commuters who live nearby;</li> <li>•□"Park and Pedal" information on nearby areas from which students, staff, and faculty can easily ride to campus; and,</li> <li>•□Additional information on the campus' Red and Black shuttle, Campus Escort Services, and location of resources such as the parking information booth.</li> </ul> <p>As future facilities are designed and constructed in accordance with the CSU's new policy on Sustainable Building Practices, the campus will endeavor to improve bicycle transportation on campus, continue to develop programs encouraging alternative modes of transportation, and will work with the City to coordinate our efforts to reduce traffic and facilitate bicycling, carpooling, and public transit.</p>	
Comment I-49-4	Comments from Thomas L. McKenzie, Ph.D,	Response
-Putting an under pass or over pass on 55th street (near the ARC and Peterson Gym).	San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment regarding an underpass or overpass on 55th Street. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
Thank you for your attention.		
Comment I-50-1	Comments from Allan M. Hodge,	Response



## Responses to Comments Report

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.

The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response can be provided or is required.

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### Comment I-50-2

### Comments from Allan M. Hodge,

### Response

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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?

The comment addresses a general subject area, the evaluation of project alternatives, which received extensive analysis in Section 5.0, Alternatives, of the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project.

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### Comment I-51-1

### Comments from Martin and Linnea Ruch, 7/24/2007

### Response

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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 Born Phoebe Hearst and have seen far too many near misses.)

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.

Preliminarily, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; a LOS exceeding "D," (i.e., LOS "E") is considered by the City to be operating at deficient conditions. Therefore, at LOS "C" (or "D") operations, Del Cerro Boulevard is not operating at deficient conditions. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS "D," based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.

With respect to the safety of schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

## Responses to Comments Report

Finally, to mitigate the proposed project's impacts at the College Avenue/Del Cerro Boulevard intersection, the Draft EIR includes mitigation measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the funds needed to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-102.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (DEIR p. 3.14-114.) Therefore, implementation of the proposed project would not result in a significant impact at this intersection.

<b>Comment I-51-2</b>	<b>Comments from Martin and Linnea Ruch, 7/24/2007</b>	<b>Response</b>
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 d o w in that area!	The comment expresses an opinion regarding the propriety of purchasing additional property upon which to further the campus expansion objectives. Please see Section 5.0, Alternatives, of the Draft EIR for discussion relating to the consideration of off-campus alternative locations. (DEIR pp. 5.0-3 to 5.0-4.) In sum, because SDSU's cost basis in the Adobe Falls Faculty/Staff Housing property is already low (in light of its long-term ownership of the property), only the proposed site can further the project's objective to provide affordable housing for faculty and staff.	
<b>Comment I-51-3</b>	<b>Comments from Martin and Linnea Ruch, 7/24/2007</b>	<b>Response</b>
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?	Preliminarily, restoration of the Adobe Falls, and the development of any trails on the Adobe Falls site, would not occur until development of the Lower Village. (See, e.g., Final EIR Mitigation Measure CR-4.) The Lower Village will be developed over the long-term, sometime beyond the year 2012, with no commencement date presently planned. (Draft EIR p. 1.0-36.) Accordingly, the Lower Village site was analyzed in the EIR at the program level of review, and development of the site will undergo additional CEQA analysis prior to project construction. During subsequent development phases, the Lower Village trail system will be designed, and any/all impacts associated with the trails will be assessed. However, it is presently contemplated that the trails to be developed on the Adobe Falls Lower Village site will be developed for use by the residents of the Adobe Falls Faculty/Staff Housing community, not for use by the general public. Therefore, with resident use of the trails, no additional vehicle trips would be generated. Moreover, even if the trails were available for public use, any vehicle traffic generated would be relatively minimal.	
<b>Comment I-52-1</b>	<b>Comments from Barbara Teemsma, 7/27/2007</b>	<b>Response</b>

## Responses to Comments Report

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 1-8 West. A metered stop light is installed at the entrance to 1-8, 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 end on Del Cerro Blvd. as residents return home again.

SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA.

To mitigate the proposed project's impacts at the College Avenue/Del Cerro Boulevard intersection, the Draft EIR includes mitigation measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the funds needed to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-102.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (See DEIR p. 3.14-114.) With implementation of this mitigation measure, the proposed project will not result in a significant impact to this intersection.

Also, with respect to the safety of residents and schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

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### Comment I-52-2

### Comments from Barbara Teemsma, 7/27/2007

### Response

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.

The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.

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Comment I-53-1	Comments from Michele Nash-Hoff, 7/5/2007	Response
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.		The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.
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.		
Comment I-53-2	Comments from Michele Nash-Hoff, 7/5/2007	Response
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 them 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.		<p>The EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.</p> <p>With respect to the comment regarding percentage increases in traffic and significant impacts, please see the response to comment I20-2 submitted by the Del Cerro Action Council by letter dated July 27, 2007.</p>
Comment I-53-3	Comments from Michele Nash-Hoff, 7/5/2007	Response
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.		The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; a LOS exceeding "D," (i.e., LOS "E") is considered by the City to be operating at deficient conditions. Therefore, at LOS "C" (or "D") operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS "D," based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.

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Also, with respect to the safety of residents and schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Comment I-53-4	Comments from Michele Nash-Hoff, 7/5/2007	Response
<p>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.</p>	<p>The Draft EIR determined that the proposed project would result in a potentially significant impact at the College Avenue/Del Cerro Boulevard intersection. To mitigate the proposed project's impacts, the Draft EIR includes mitigation measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the funds needed to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-102.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (DEIR p. 3.14-114.) Therefore, with implementation of mitigation measure TCP-1, the proposed project would not significantly impact this intersection.</p>	<p>With regards to emergency access/response times, as discussed in Draft EIR Section 3.14, the proposed Adobe Falls Faculty/Staff Housing project component would not result in significant impacts relating to traffic and, therefore, the additional traffic associated with the proposed project would not result in a significant impact to emergency medical service access. (DEIR p. 3.14-98.) Additionally, as discussed in Draft EIR Section 3.13, Public Utilities and Services Systems, emergency response vehicles have the right-of-way and are exempted from rules of the road in emergency situations. Therefore, any surrounding traffic that would be on the roadways must yield the right-of-way and immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and stop until the emergency vehicle has passed. (DEIR pp. 3.13-28 - 29.) Accordingly, the proposed project would not significantly impact the provision of emergency services to residents of the Del Cerro community.</p>

## Responses to Comments Report

### Comment I-53-5

### Comments from Michele Nash-Hoff, 7/5/2007

### Response

5. 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 would 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. 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 would appreciate a response to the inaccuracies I have noted above.

Mitigation measure TCP-24 requires that following occupancy of the Adobe Falls Faculty/Staff Housing Lower Village, and every six months thereafter, SDSU is to conduct traffic counts on Adobe Falls Road, Mill Peak Road, Capri Drive, Arno Drive, and Genoa Drive, to determine existing roadway average daily trips ("ADT"). At such time as the ADT generated by the Adobe Falls Faculty/Staff Housing Upper and Lower Villages reaches 80% of the total ADT forecast in the EIR, SDSU is required to institute regular shuttle service to the community to ensure project-generated ADT do not exceed the levels forecast in the EIR. (DEIR pp. 3.14-107 to 108.) Because the majority of the vehicle trips to be generated by the faculty/staff housing will be to/from the SDSU campus, it is the traffic engineer's professional judgment that a reduction in traffic of 10% would occur with implementation of the shuttle, and that it is probable the reduction would actually be higher.

Therefore, the "full amount of traffic" to be generated by the project is the ADT amount reported in the analysis; following buildout of the Upper and Lower Villages, traffic levels would not exceed the levels forecast in the EIR. Significantly, however, even if the trip generation was not reduced by 10% due to operation of the shuttle as the traffic engineer forecasts, the existing roadways have sufficient available carrying capacity to handle the additional traffic such that even if the amount of project traffic were increased by 10%, each of the Del Cerro roadways would continue to operate at acceptable conditions.

### Comment I-54-1

### Comments from Gerry A. Hodge, 7/26/2007

### Response

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:

1. Your neighborhood sheets of Arno, Genoa, Capri, Adobe Falls Road, Rockhurst and Lambda from 1500 ADT to 700 ADT per day.

The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.

### Comment I-54-2

### Comments from Gerry A. Hodge, 7/23/2007

### Response

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.

The EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts

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in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.

Comment I-55-1	Comments from Jean Ashour, 7/26/2007	Response
<p>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.</p> <p>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 this community are greatly appreciated.</p> <p>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.</p>	<p>San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.</p>	
Comment I-56-1	Comments from Eleanor W. Lynch, PhD, 7/26/2007	Response
<p>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.</p> <p><b>3.126 CUMULATIVE IMPACTS</b>□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.</p> <p>The number of students is projected to increase 34% in the years between 2006-</p>	<p>Student housing surveys show that not all students want to live in the College Area in on-campus or off-campus housing owned or managed by SDSU. Based on existing SDSU student residence distribution patterns, as well as price considerations expressed in housing preference surveys, not all SDSU students will have the means to live away from home (either on campus or in privately managed housing nearby SDSU). (See, Draft EIR pp. 3.12-10 to 11; 3.12-19 to 20.) Furthermore, not all of the future students will choose to live in the immediate vicinity of SDSU in the College Area community. Therefore, it is not feasible for SDSU to provide an equivalent number of student housing beds as increased student enrollment, as the comment suggests.</p> <p>The proposed 2007 Campus Master Plan Revision provides for the near-term</p>	

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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.

and long-term development of an additional 2,976 on-campus student housing beds intended primarily to address the community's concern with nuisance rentals, i.e., mini-dorms. In combination with the number of existing student housing units, and planned number of housing units located within 1 mile of campus, the EIR determined that the projected increase in the availability of on-campus and nearby multi-family campus housing (not mini-dorms) over the next 15-20 years would accommodate 50% of the future student population, an amount that is likely to exceed student housing demand. (Draft EIR p. 3.12-19.) Therefore, as reported in the Draft EIR, the proposed Campus Master Plan Revision would not result in significant direct or cumulative impacts relative to population and housing.

Comment I-56-2	Comments from Eleanor W. Lynch, PhD, 7/26/2007	Response
<p>Suggesting that there will be no cumulative impacts in an area that is already in litigation and dispute with the university over mini-dorms 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.</p> <p>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.</p>	<p>The effects of the proposed Campus Master Plan relative to nuisance rentals is addressed in Draft EIR Section 3.12, Population and Housing. (See Draft EIR pp. 3.12-20 to 24.) Preliminarily, it should be noted that CEQA requires that an EIR analyze a project's potential significant impacts on the environment. The EIR does not suggest that the increased student enrollment proposed under the Campus Master Plan Revision would have no impact on the surrounding environment -- the question is whether those impacts would be significant. Because the proposed project does not include the development of any nuisance rentals, combined with the fact that the City, with the help of SDSU is attempting to curb the future development/expansion of additional nuisance rentals, and considering the large number of multi-family housing units suitable for student use that are forecast to be developed in the surrounding community over the next 15-20 years, any potential impacts associated with an expanded student body resulting in additional student use of single family homes in the surrounding community would be less than significant. (Draft EIR p. 3.12-23.)</p> <p>The solution to the rise of nuisance rentals ("mini-dorms") in the College Area Community is multi-faceted. Development of additional multi-family housing units in the College Area Community and along transit routes will help provide additional options for students and, through the effects of a free market economy, may help increase competition and therefore reduce the price of available units. The City of San Diego, through local land use and zoning controls, has helped curb the flow of students utilizing single family homes as mini-dorms. In July 2007, the City of San Diego City Council voted in favor to amend the Land Development Code to restrict the number of bedrooms in single family residential neighborhoods, limit the width of driveways and clarify the requirements for garage conversions (City of San Diego, City Council</p>	



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Meeting Minutes, July 9, 2007). Further, a proposed “rooming house” ordinance is planned for hearing by the City Council in the Fall of 2007. This ordinance would restrict commercial lease activity of single family homes to multiple lease-holders in specific single family residential neighborhoods of the City. The City of San Diego Police Department has and continues to be instrumental in reducing the negative impacts of mini-dorms. A six-month pilot program instituted by the City of San Diego Police Department and City's Neighborhood Code Compliance Division has resulted in issuance of 30 \$1,000 citations as of early August 2007 (San Diego Union Tribune, August 5, 2007).

Further, the City Council and San Diego Police Department continue to and have increased support/enforcement of the Community Assisted Party Program (CAPP) which provides a mechanism to combat chronic party houses (City of San Diego, City Council Meeting Minutes, July 9, 2007). SDSU-sponsored on-campus housing development will assist in providing students with close and convenient living choices. All of the above efforts constitute important components of the multi-faceted issue of mini-dorms. Because it is likely that these efforts will help curb the amount of, and negative community effects of mini-dorms, any impacts associated with nuisance rentals and the proposed Campus Master Plan Revision would be less than significant.

Comment I-56-3	Comments from Eleanor W. Lynch, PhD, 7/26/2007	Response
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 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.	San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.	
Thank you for your attention to these concerns.		
Comment I-57-1	Comments from Agatha Graney, 7/27/2007	Response
Although SDSU's most recent plan is more acceptable than the first, there continues to remain several issues important to me.	The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway	

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1. Traffic. The EIR continues to misclassify our local streets. It says that our local residential streets can carry 1500 ADT. However, my s k e t and neighboring ones are low volume residential street that carry a capacity of 700 ADT.

conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.

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### Comment I-57-2

### Comments from Agatha Graney, 7/27/2007

### Response

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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.

The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; a LOS exceeding "D," (i.e., LOS "E") is considered by the City to be operating at deficient conditions. Therefore, at LOS "C" (or "D") operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS "D," based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.

Also, with respect to the safety of residents and schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

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### Comment I-57-3

### Comments from Agatha Graney, 7/27/2007

### Response

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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.

The EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro

## Responses to Comments Report

roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.

Comment I-57-4	Comments from Agatha Graney, 7/27/2007	Response
<p>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.</p>	<p>The Draft EIR determined that the proposed project would result in a potentially significant impact at the College Avenue/Del Cerro Boulevard intersection. To mitigate the proposed project's impacts, the Draft EIR includes Mitigation Measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of the funds needed to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-102.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (See DEIR p. 3.14-114.) Therefore, with implementation of TCP-1, the proposed project would not result in a significant impact.</p>	
Comment I-57-5	Comments from Agatha Graney, 7/27/2007	Response
<p>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 then undo the 10%. The EIR does not address the potential of outside traffic using these facilities.</p>	<p>Preliminarily, the development of any trails on the Adobe Falls site, would not occur until development of the Lower Village. (See, e.g., Final EIR Mitigation Measure CR-4.) The Lower Village will be developed over the long-term, sometime beyond the year 2012, with no commencement date presently planned. (Draft EIR p. 1.0-36.) Accordingly, the Lower Village site was analyzed in the EIR at the program level of review, and development of the site will undergo additional CEQA analysis prior to project construction. During subsequent development phases, the Lower Village trail system will be designed, and any/all impacts associated with the trails will be assessed. However, it is presently contemplated that the trails to be developed on the Adobe Falls Lower Village site will be developed for use by the residents of the Adobe Falls Faculty/Staff Housing community, not for use by the general public. Therefore, with resident use of the trails, no additional vehicle trips would be generated. Moreover, even if the trails were available for public use, any vehicle traffic generated would be relatively minimal.</p>	
Comment I-57-6	Comments from Agatha Graney, 7/27/2007	Response
<p>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.</p>	<p>A full analysis of sensitive species is presented in Section 3.3, Biological Resources, of the Draft EIR. The Draft EIR concludes that, with implementation of the mitigation measures provided, the proposed project would not result in significant impacts to these biological resources. The</p>	

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Biological Resources Report prepared for the project, and containing a fully biological impact study, can be found in Draft EIR, Appendix D.

<b>Comment I-57-7</b>	<b>Comments from Agatha Graney, 7/27/2007</b>	<b>Response</b>
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.		The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.
<b>Comment I-58-1</b>	<b>Comments from Suzanne D. Schumacher, 7/27/2007</b>	<b>Response</b>
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 neighbors car was totaled by a service vehicle in broad daylight a couple of weeks ago.		SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Draft EIR Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA. (Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding roadway capacity.) Specific to construction traffic, the Upper Village and the Lower Village will each be constructed separately. The Upper Village would be developed in the near-term, with construction planned to begin during the 2010-2012 timeframe. The Lower Village, in contrast, would be developed over the long-term, sometime beyond the year 2012, with no commencement date presently planned. (Draft EIR p. 1.0-36.) Consequently, the two Villages would not be constructed simultaneously and any construction vehicle traffic would be incremental -- the 48-unit Upper Village would be built first, followed by construction of the Lower Village. Additionally, as noted above, the EIR traffic impacts analysis determined that the Del Cerro roadways have adequate capacity to handle project traffic at full development buildout. Therefore, the roads would have sufficient capacity to handle the relatively limited number of vehicle trips associated with project construction.
<b>Comment I-58-2</b>	<b>Comments from Suzanne D. Schumacher, 7/27/2007</b>	<b>Response</b>

## Responses to Comments Report

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.

With respect to the safety of schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue – Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the funds needed to implement feasible traffic calming measures identified in the Study.

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### Comment I-58-3

### Comments from Suzanne D. Schumacher, 7/27/2007

### Response

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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.

Preliminarily, the comment is incorrect, Del Cerro Blvd. is not presently operating at deficient levels of service. The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; an LOS exceeding "D," (i.e., LOS E) is considered by the City to be operating at deficient conditions. Therefore, at LOS C (or D) operations, Del Cerro Boulevard is not operating at deficient conditions, as the comment implies. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS D, based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.

SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Draft EIR Section 3.14, Transportation/Circulation and Parking, the roadways have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA. (Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding roadway capacity.)

The Draft EIR determined that the proposed project would result in significant impacts at the College Avenue/Del Cerro Blvd. intersection. To mitigate the proposed project's impacts, the Draft EIR includes mitigation measure TCP-1, which requires SDSU to contribute to the City of San Diego its fair-share of

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the funds needed to provide two left-turn lanes and one shared through/right turn lane on the westbound approach. (DEIR p. 3.14-102.) The Draft EIR includes a calculation, made on the basis of traffic modeling, illustrating that implementation of the proposed roadway improvements would lower the delay at the intersection by an amount greater than the project adds to the delay. (See DEIR p. 3.14-114.) Therefore, with implementation of TCP-1, the proposed project would not result in a significant impact to this intersection.

Finally, because the proposed Adobe Falls Faculty/Staff Housing project component would not result in significant impacts relating to traffic and, therefore, the additional traffic associated with the proposed project would not result in a significant impact to emergency medical service access. (DEIR p. 3.14-98.) Additionally, as discussed in Section 3.13, Public Utilities and Services Systems, emergency response vehicles have the right-of-way and are exempted from rules of the road in emergency situations. Therefore, any surrounding traffic that would be on the roadways must yield the right-of-way and immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and stop until the emergency vehicle has passed. (DEIR pp. 3.13-28 - 29.)

Comment I-58-4	Comments from Suzanne D. Schumacher, 7/27/2007	Response
This neighborhood of 50 years does not deserve to be demolished and made undesirable for our current and future homeowners. Please do not allow this to occur. Thank you for your attention.	The comment expresses an opinion. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.	

Comment I-59-1	Comments from Rick Dallin, 7/27/2007	Response
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 and from campus? HOW has the trolley impacted parking on campus?	SDSU has in place a comprehensive traffic and management plan for the campus. As SDSU transitions from a 'commuter' to a 'community' campus, students are now able to use the MTS green line facility as an alternative to driving, travel between campus and nearby cultural activities, and be part of a new 'green-friendly' campus environment. In conjunction with the Metropolitan Transit District, SDSU has bolstered efforts to increase transit usage by providing subsidized transit passes for students and reduced rate monthly passes for faculty and staff. Over 3,000 transit passes were sold during the first Fall semester of operations. During the second year of operations, 2006, ridership increased to over 4,500 students.	

The programs promoted and information provided on the University's Parking

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and Transportation website include:

- Bus and trolley information with links to schedules;
- Tips on using alternative traffic routes and parking in areas of campus that are less congested;
- SDSU's "School Pool", a rideshare program which is free to all students, faculty and staff. Those interested, whether they drive or not, can apply online at [www.ridelink.com](http://www.ridelink.com) and are paired with other SDSU commuters who live nearby;
- "Park and Pedal" information on nearby areas from which students, staff, and faculty can easily ride to campus; and,
- Additional information on the campus' Red and Black shuttle, Campus Escort Services, and location of resources such as the parking information booth.

As future facilities are designed and constructed in accordance with the CSU's new policy on Sustainable Building Practices, the campus will endeavor to improve bicycle transportation on campus, continue to develop programs encouraging alternative modes of transportation, and will work with the City to coordinate our efforts to reduce traffic and facilitate bicycling, carpooling, and public transit.

With respect to the question how has the trolley impacted parking on campus, since the institution of trolley service to the SDSU campus in July 2005, the university has seen a significant drop in parking permit sales.

Comment I-59-2	Comments from Rick Dallin, 7/27/2007	Response
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.  Thank you.		San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.
Comment I-60-1	Comments from Frank and Zoila Gudgell, 7/25/2007	Response
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. SDSUs "...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		Preliminarily, it is noted that the proposed Campus Master Plan Revision provides for the development of 2,976 new on-campus student housing beds by the academic year 2024/25, with 1,976 of those beds to be available by the 2011/2012 academic year. (Draft EIR p. 1.0-49 to 54.)  With respect to housing goals, the subject of university housing is addressed in Draft EIR Section 3.12, Population and Housing. SDSU estimates that presently 31-33% of all students live either on-campus, or within one mile of campus in off-campus multi-family housing (e.g., apartments). (Draft EIR p.

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solve the student housing crunch resulting from the University expansion.

3.12-17.) EIR Table 3.12-10 provides a list of the student housing units that are expected to be available on campus and within one mile of campus by the 2011/2012 academic year, and academic year 2024/2025. (Draft EIR p. 3.12-19.) As Table 3.12-10 shows, by the year 2024/25, there will be approximately 22,000 student housing beds available on-campus or in off-campus multi-family housing (not mini-dorms). This would be enough housing to accommodate 50% of the future student population and likely would exceed student demand. (Draft EIR p. 3.12-19.)

Comment I-61-1	Comments from Don and Ann Cottrell, 7/27/2007	Response
<p>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.</p> <p>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.</p> <p>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.</p> <p>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 in popular major with supporting upper division GE; business and liberal studies are likely choices along with teacher education.</p>	<p>As discussed in Draft EIR Section 5.4, Institutional Alternatives, SDSU has in the past, and continues to, explore the establishment of off-campus centers in both the South Bay and East County San Diego regions. Included within this effort, SDSU has been in intermittent talks with Chula Vista officials about developing a satellite campus in that city for many years. However, as discussed further in Section 5.4, it is not presently feasible from a student demand perspective and, consequently, cost perspective, to develop a South Bay alternative.</p> <p>Furthermore, also as discussed in Section 5.4, aside from the feasibility of establishing another university in the greater San Diego region, 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, rather than avoiding or lessening the significant impacts of the proposed project. As in the past, when opportunity is presented and/or when enrollment demand demonstrates the need to provide off-site instruction and remote facilities, SDSU will make every effort to respond to the call.</p>	

Comment I-61-2	Comments from Don and Ann Cottrell, 7/27/2007	Response
<p>2. Infrastructure mitigation.</p> <p>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</p>	<p>Under CEQA, SDSU/CSU is not required to pay more than is necessary to mitigate the identified significant impacts of the proposed 2007 Campus Master Plan Revision project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341, 361-362.) The Draft EIR calculated the SDSU/CSU fair-share percentages according to</p>	



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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.

the formula used by the City of San Diego. The formula, and resulting calculations, are shown at Draft EIR pp. 3.14-108 - 110.

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**Comment I-61-3****Comments from Don and Ann Cottrell, 7/27/2007****Response**

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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.

Under the California Supreme Court's ruling in *City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal.4th 341, SDSU/CSU's power to mitigate the effects of the project is ultimately subject to legislative control; if the Legislature does not appropriate the funds necessary to mitigate the significant impacts of the project to the jurisdictional agency, then CSU does not have the power to mitigate the project's effects. (39 Cal.4th at 367.)

Therefore, as the Draft EIR notes in the Transportation/Circulation and Parking section, SDSU's fair-share funding commitment towards the identified roadway improvements is necessarily conditioned upon 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. (Draft EIR p. 3.14-117.) However, the law does not require that SDSU abandon the project, or parts of the project, in the event the Legislature denies funding of the identified roadway mitigation. Please see General Response 3, *City of Marina Compliance*, for additional information responsive to this comment.

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**Comment I-61-4****Comments from Don and Ann Cottrell, 7/27/2007****Response**

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**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 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.

Preliminarily, it is noted that the student enrollment increase will occur gradually over the next 15-20 years; therefore, the student enrollment will increase annually by approximately 500 students.

Additionally, EIR Table 3.12-10 provides a list of the student housing units that are expected to be available on campus and within one mile of campus by the 2011/2012 academic year, and academic year 2024/2025. (Draft EIR p. 3.12-19.) As Table 3.12-10 shows, by the year 2024/25, there will be approximately 22,000 student housing beds available on-campus or in off-campus multi-family housing (not mini-dorms). This would be enough housing to accommodate 50% of the future student population and likely would exceed student demand. (Draft EIR p. 3.12-19.) Both Sorority Row and The Paseo projects are presently "on hold"; however, both are expected

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to be developed in the long-term and, therefore, will provide additional student housing.

The proposed Rooming House Ordinance is intended to address the community's concerns regarding nuisance rentals (or mini-dorms). As noted above, there will be adequate housing for students available on-campus and off-campus in multi-family housing (apartments) and, therefore, the proposed ordinance would not significantly impact the long-term student housing supply.

Comment I-61-5	Comments from Don and Ann Cottrell, 7/27/2007	Response
<p>4. Parking and transportation.</p> <p>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.</p>	<p>As SDSU transitions from a 'commuter' to a 'community' campus, students are now able to use the MTS green line facility as an alternative to driving, travel between campus and nearby cultural activities, and be part of a new 'green-friendly' campus environment. In conjunction with the Metropolitan Transit District, the University has bolstered efforts to increase transit usage by providing subsidized transit passes for students and reduced rate monthly passes for faculty and staff.</p> <p>In addition, the University's Parking and Transportation website includes information to further facilitate a reduction in campus-related automobile trips:</p> <ul style="list-style-type: none"> <li>•□Bus and trolley information with links to schedules;</li> <li>•□Tips on using alternative traffic routes and parking in areas of campus that are less congested;</li> <li>•□SDSU's "School Pool", a rideshare program which is free to all students, faculty and staff. Those interested, whether they drive or not, can apply online at <a href="http://www.ridelink.com">www.ridelink.com</a> and are paired with other SDSU commuters who live nearby;</li> <li>•□"Park and Pedal" information on nearby areas from which students, staff, and faculty can easily ride to campus; and,</li> <li>•□Additional information on the campus' Red and Black shuttle, Campus Escort Services, and location of resources such as the parking information booth.</li> </ul> <p>As future facilities are designed and constructed in accordance with the CSU's new policy on Sustainable Building Practices, the campus will endeavor to improve bicycle transportation on campus, continue to develop programs encouraging alternative modes of transportation, and will work with the City to coordinate our efforts to reduce traffic and facilitate bicycling, carpooling, and public transit.</p>	

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<b>Comment I-61-6</b>	<b>Comments from Don and Ann Cottrell, 7/27/2007</b>	<b>Response</b>
<p>5. Hotels.</p> <p>The DEIR lists two future hotels. This does not seem reasonable; one is an important Contribution, but not two.</p>	<p>The proposed Campus Master Plan Revision proposes the development of one hotel - the Alvarado Hotel, to be located on Alvarado Road in the northeast portion of campus. (See Draft EIR p. 1.0-54.)</p> <p>San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.</p>	
<b>Comment I-62-1</b>	<b>Comments from Mrs. Wayne Richards, 7/27/2007</b>	<b>Response</b>
<p>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.</p>	<p>The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response can be provided or is required.</p>	
<b>Comment I-62-2</b>	<b>Comments from Mrs. Wayne Richards, 7/27/2007</b>	<b>Response</b>
<p>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 overcrowded and create a problem for the existing communities near the university.</p>	<p>San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.</p>	
<b>Comment I-62-3</b>	<b>Comments from Mrs. Wayne Richards, 7/27/2007</b>	<b>Response</b>
<p>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 degree 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</p>	<p>The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to San Diego State University and the Board of Trustees of the California State University prior to a final decision on the proposed 2007 Campus Master Plan Revision project. However, because the comment does not address or question the content of the Draft EIR, no further response can be provided or is required.</p>	

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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.

Comment I-62-4	Comments from Mrs. Wayne Richards, 7/27/2007	Response
	<p>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.</p>	<p>San Diego State University and the Board of Trustees of the California State University acknowledge your input and comments. The comments will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.</p>
Comment I-63-1	Comments from Steve Rice (Tice),	Response
	<p>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.</p> <p>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.</p> <p>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.</p>	<p>San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. Your comments will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.</p>
Comment I-64-1	Comments from Patrick Hevesy,	Response
	<p>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.</p>	<p>With respect to the number of vehicle trips generated by the Lower Village component of the Adobe Falls Faculty/Staff Housing, the 1040 average daily trip ("ADT") figure identified in Figure 8-4 is a typographical error. The correct</p>

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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.

figure, and the figure upon which the Draft EIR's analysis appropriately relies, is 990 ADT. (DEIR p. 3.14-37.) Therefore, the reason that the Draft EIR contains the 1040 ADT figure only once is because the use of the figure was an error. (This error (i.e., the representation in Figure 8-4 that the proposed Lower Village would generate 1040 ADT) will be corrected in the Final EIR section entitled "Revised Draft EIR Pages.")

A full and thorough analysis of the impacts to the Del Cerro community's roadways is presented in the Draft EIR; and, this analysis correctly assumes that the proposed Lower Village would result in the addition of 990 ADT. This analysis concludes that the existing roadway capacity can accommodate the traffic that would be generated by the proposed project; therefore, the impact would be less than significant.

As to the comment's concern for the "existing uniquely sloped grade" on Adobe Falls Road, this factor was considered in classifying the road's capacity and subsequently analyzing project related impacts. (DEIR p. 3.14-12; see also General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.) Additionally, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) Although the focus of the study will be on the vicinity of the elementary schools near the Del Cerro Boulevard/College Avenue intersection, the area of the Adobe Falls Road grade can be addressed as well. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.

Comment I-64-2	Comments from Patrick Hevesy,	Response
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.		<p>The comment incorrectly states that SDSU does not have authority to purchase property. In fact, SDSU may purchase property; it may not, however, sell campus property.</p> <p>Also, to the extent that the comment expresses an opinion regarding the propriety of purchasing additional property upon which to further the campus expansion objectives, please see Section 5.0, Alternatives, of the Draft EIR for discussion relating to the consideration of off-campus alternative locations. (DEIR pp. 5.0-3 to 5.0-4.) In sum, because SDSU's cost basis in</p>

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the Adobe Falls Faculty/Staff Housing property is already low (in light of its long-term ownership of the property), only the proposed site can further the project's objective to provide affordable housing for faculty and staff.

Comment I-64-3	Comments from Patrick Hevesy,	Response
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, Genoa, Capri, Adobe Falls Road, Rockhurst and Lambda are Low Volume Residential Local Streets, with a capacity of only 700 ADT per day.		The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.
Comment I-64-4	Comments from Patrick Hevesy,	Response
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 S1380 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.		<p>The EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.</p> <p>With respect to the comment regarding traffic percentage increases and significant impacts, please see the response to comment O4-2 submitted by the Del Cerro Action Council by letter dated July 27, 2007.</p>
Comment I-64-5	Comments from Patrick Hevesy,	Response
5. The MR 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		Del Cerro Boulevard is not presently operating at deficient conditions. The 5000 average daily trip ("ADT") capacity assigned to Del Cerro Boulevard equates to a level of service ("LOS") "C." In contrast, the City of San Diego utilizes LOS "D" as its minimum LOS; a LOS exceeding "D," (i.e., LOS "E") is considered by the City to be operating at deficient conditions. Therefore, at LOS "C" (or "D") operations, Del Cerro Boulevard is not operating at deficient

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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.

conditions. Moreover, since the addition of project traffic does not cause the LOS on Del Cerro Boulevard to degrade to a level worse than LOS "D," based on the City's thresholds, the project would not result in significant impacts on Del Cerro Boulevard.

With respect to the comment regarding the safety of schoolchildren, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) The Study would focus on the vicinity of the two elementary schools located near the intersection of Del Cerro Boulevard and College Avenue -- Phoebe Hearst Elementary School and the Temple Emanuel School. Following completion of the Study, SDSU would be required to contribute its fair-share of the funds needed to implement feasible traffic calming measures identified in the Study.

Comment I-64-6	Comments from Patrick Hevesy,	Response
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.		The comments presented in the letter were submitted during the public comment period for the SDSU 2007 Campus Master Plan Revision Draft Environmental Impact Report prepared under the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 et seq. Responses to the comments will be provided consistent with the requirements of CEQA.
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.		
We appreciate your expeditious attention to this matter and hope that a resolution can be worked out amicably.		

Comment I-65-1	Comments from Linda Kilroy,	Response
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.		The many services provided by SDSU's Office of Housing Administration and Residential Education Office (HA/RE) include assisting students with off-campus housing options. Resources include a web page designed to supply students with information about apartment hunting, the names of local communities, and discussions about how to choose a roommate or deciding on a budget. Although an electronic listing service for off-campus housing was offered in the past, it was discontinued after determining it was infeasible
Section 3.12 - Population and Housing		

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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."

to ensure nuisance rentals were not also included in the listings. Recognizing a need to enhance efforts to address off-campus housing issues, Student Affairs is in the process of hiring for a new position, an Off-Campus Housing Program Coordinator that will work to coordinate off-campus housing options.

Comment I-65-2	Comments from Linda Kilroy,	Response
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?		As the Draft EIR notes in Table 2.0-1, the former Paseo project presently is "on-hold." SDSU presently is re-assessing the viability of the former Paseo project in light of changing circumstances, and it is uncertain what will result on this property. SDSU is still committed to the overall objectives of the Paseo, and would one day support a project on that site that incorporates student housing, retail and other amenities in an environment appropriate to a university setting. It is reasonable to expect that a Paseo-like project eventually will be developed on the site and, therefore, the Draft EIR includes the number of student housing beds that would have been developed under the Paseo project (1,300) in its long-term projections of available student housing beds. See Draft EIR Table 3.12-10.
Comment I-65-3	Comments from Linda Kilroy,	Response
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 converted to "group housing" over the last 5 years.		As outlined in Draft EIR Table 3.12-5 (p. 3.12-10), as of 2004, 2,993 students (17%) lived on campus and 2,705 students (16%) lived in the College Area Community. These data do not differentiate between multi- or single-family dwelling units. Data regarding the number of units that have been converted to "group housing" over the last 5 years are not available. However, the focus of the EIR analysis is to determine the potential impacts of the proposed Campus Master Plan Revision on the environment, including issues relating to Population and Housing. This analysis is provided in EIR Section 3.12, Population and Housing, which includes an analysis of the proposed project's impacts relative to nuisance rentals( mini-dorms).
Comment I-65-4	Comments from Linda Kilroy,	Response
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		The analysis is presented in the Draft EIR at pages 3.12-20 to 24, and the conclusion is based on a combination of factors, including the fact that SDSU is providing almost 3,000 additional on-campus student housing beds as part of the proposed project; the fact that there will be enough student housing available either on-campus or off-campus in multi-family apartment type-units (not mini-dorms) to house almost 50% of the projected future student population, likely exceeding the expected demand; and, the fact that the City of San Diego, with the assistance and cooperation of SDSU, is taking steps to



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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.

enforce existing nuisance laws, and attempting to curb the future development and expansion of nuisance rentals. Please also see General Response 2, Population and Housing Related Matters for additional information responsive to this comment.

<b>Comment I-65-5</b>	<b>Comments from Linda Kilroy,</b>	<b>Response</b>
Comment 5: SDSU has commissioned a housing demand and market study, scheduled for release in Fall 2007 (3.12-15). The final ER should not be prepared until the results of this study can be incorporated.		The referenced student housing financing feasibility report is still being prepared and is not yet complete. A substantial amount of work remains to be done on the report, and SDSU anticipates that it will be completed sometime around the end of the year. SDSU has discussed preliminary information regarding the report with the report's authors, and the report contains no significant new information that would alter the conclusions reached in the Draft EIR. It is not necessary to extend the Draft EIR comment period.
<b>Comment I-65-6</b>	<b>Comments from Linda Kilroy,</b>	<b>Response</b>
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 am." 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 its own sanctions against students who are creating such a public nuisance that police must be called to intervene.		<p>The comment regarding City of San Diego Municipal Code Section 59.5.0502 on page 3.12-21 of the Draft EIR is noted; the text will be revised as follows:</p> <ul style="list-style-type: none"> <li>•□If sound production or reproduction is clearly audible 50 feet from a sensitive receptor's property line between the hours of 10:00 pm and 8:00 am, a citation may be issued.</li> </ul> <p>Issues addressed – Noise Enforcement Entity – SDSU police; City police</p> <p>The Final EIR will contain the revised text.</p> <p>With respect to the proposed Rooming House Ordinance, Draft EIR Section 3.12.5.2.1.1 will be revised to include a reference to the City of San Diego "rooming house ordinance" that is to be considered at an upcoming City Council meeting. The ordinance, if adopted, is intended to clarify the number of unrelated individuals who can live in one single family residence. The following "rooming house ordinance" text will be added to the EIR at page 3.12-22:</p> <ul style="list-style-type: none"> <li>•□The City of San Diego is contemplating a "rooming house" ordinance would restrict commercial lease activity of single family homes to multiple lease-holders in specific single family residential neighborhoods of the City. This</li> </ul>

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ordinance is planned for consideration at an upcoming City of San Diego City Council meeting.

Issues addressed – Large numbers of unrelated individuals living in single family homes within single family neighborhoods.

Enforcement Entity – City administration

The Final EIR will include the additional text.

With respect to the comment that SDSU should impose its own sanctions against students who create a public nuisance, a Student Conduct Code, enforced by SDSU University Police, is already in place to help curb illegal and inappropriate behavior. The Student Conduct Code, California Code of Regulations, Article 2, Section 41301, applies to all students on-campus and off-campus, in the area bordered to the north by Interstate 8, west at 55th Street, south at College Place/Greek Circle, and east at East Campus Place. The Code outlines a scope of conduct for students, a violation of which can result in sanctions. Student behavior that is not consistent with the Code is addressed through an educational process designed to promote safety and good citizenship and, when necessary, impose appropriate consequences. Thus, students face academic disciplinary action from the university in addition to legal action. Conduct that violates the Code includes, but is not limited to:

Any act chargeable as a violation of a federal, state, or local law that poses a substantial threat to the safety or well-being of members of the university (or off-campus community), to property within the university (or off-campus community), or poses a significant threat of disruption or interference with university operations.

Illegal use, possession, manufacture, or distribution of alcoholic beverages, or public intoxication.

Use, possession, manufacture, or distribution of illegal drugs or drug-related paraphernalia, or the misuse of legal pharmaceutical drugs.

Participating in an activity that substantially and materially disrupts the normal operations of the university, or infringes on the rights of members of the university or off-campus community.

Conduct that threatens or endangers the health or safety of any person within or related to the university community, including physical abuse, threats, intimidation, harassment, or sexual misconduct. Hazing, or conspiracy to haze, as defined in Education Code Sections 32050 and 32051.

Comment I-65-7	Comments from Linda Kilroy,	Response
Section 3.14 - Transportation/Circulation and Parking		The September 2006 and February 2007 traffic counts were taken between

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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 2008 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.

7:00 and 9:00 a.m., and, between 4:00 and 6:00 p.m. These hours are the standard peak hours for traffic analysis purposes. Pedestrian counts also were conducted at each intersection, and this activity is accounted for within the Montezuma Road/College Avenue intersection impacts analysis.

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**Comment I-65-8****Comments from Linda Kilroy,****Response**

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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. /1-8 interchange, Montezuma Rd. (between Fairmount Ave. to Collwood Blvd.), Alvarado Rd. (between East Campus Drive to 70h SL), and I-S (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.

Under the California Supreme Court's ruling in *City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal.4th 341, SDSU/CSU's power to mitigate the effects of the project is ultimately subject to legislative control; if the Legislature does not appropriate the funds necessary to mitigate the significant impacts of the project to the jurisdictional agency, then CSU does not have the power to mitigate the project's effects. (39 Cal.4th at 367.)

Therefore, as the Draft EIR notes in the Transportation/Circulation and Parking section, SDSU's fair-share funding commitment towards the identified roadway improvements is necessarily conditioned upon 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. (Draft EIR p. 3.14-117.) However, the law does not require that SDSU abandon the project, or parts of the project, in the event the Legislature denies funding of the identified roadway mitigation. Please see General Response 3, *City of Marina Compliance*, for additional information responsive to this comment.

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**Comment I-65-9****Comments from Linda Kilroy,****Response**

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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/70 the Street

The mitigation measures proposed in the Draft EIR to mitigate the identified impacts to Alvarado Road and the referenced intersections are provided in DEIR Section 3.14.13. The mitigation measures, and the respective intersection/roadway segment addressed by the measure, are: TCP-2

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intersections.

[College Avenue/I-8 EB ramps]; TCP-3 [College Avenue/Canyon Crest]; TCP-7 [Alvarado Road, E. Campus Drive to Reservoir Drive]; TCP-8 [Alvarado Road, Reservoir Drive to 70th Street]; TCP-14 [College Avenue/I-8 WB ramps]; TCP-15 [College Avenue/Canyon Crest]; TCP-17 [Alvarado Road/Alvarado Court]; TCP-18 [Reservoir Drive/Alvarado Road]; TCP-20 [Alvarado Road/70th Street]; and TCP-21 [I-8 eastbound ramps/Alvarado Road].

Comment I-65-10	Comments from Linda Kilroy,	Response
Comment 10: Increasing the number of lanes on Alvarado Road between Reservoir Drive and the 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.		It is not certain that the removal of on-street parking would be necessary to widen Alvarado Road. Mitigation measures TCP-7 and TCP-8, which provide mitigation for the project's contribution to the forecast conditions on Alvarado Road, require that SDSU contribute to the City of San Diego its fair-share of the costs to widen Alvarado Road, from E. Campus Drive to Reservoir Drive to 70th Street. Under the law, SDSU/CSU is not required to pay more than is necessary to mitigate the significant impacts of the proposed project; CEQA requires that mitigation measures be "roughly proportional" to the impacts of the project. (City of Marina, 39 Cal.4th at 361-362.) The mitigation measures contemplate only that Alvarado Road will be widened, and they do not require necessarily the removal of on-street parking.
Comment I-66-1	Comments from Steven Barlow,	Response
SDSU is currently soliciting comments about its revised master plan, 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.		It is not certain that the removal of on-street parking would be necessary to widen Alvarado Road. Mitigation measures TCP-7 and TCP-8, which provide mitigation for the project's contribution to the forecast conditions on Alvarado Road, require that SDSU contribute to the City of San Diego its fair-share of the costs to widen Alvarado Road, from E. Campus Drive to Reservoir Drive to 70th Street. The mitigation measures contemplate only that Alvarado Road will be widened, and they do not require necessarily the removal of on-street parking.
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.		With respect to the suggestion that SDSU provide parking for any on-street parking that might be displaced as a result of the widening of Alvarado Road, SDSU, in conjunction with the City of San Diego, will consider all available options in this regard. San Diego State University and the Board of Trustees of the California State University acknowledge your input and comment. The comment will be included as part of the record and made available to the Board of Trustees prior to a final decision on the proposed 2007 Campus Master Plan project.
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		

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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.

Comment I-66-2	Comments from Steven Barlow,	Response
<p>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.</p> <p>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 master plan was submitted for the EIR. Questions about bicycles were raised at the original master plan EIR presentations, but apparently were not addressed either in the revised master plan, or in the EIR documents.</p> <p>□ 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).</p> <p>□ 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.</p> <p>I look forward to seeing these issues addressed in the final master plan EIR.</p>	<p>Bicycles as an alternative transportation mode are a part of SDSU's parking and transportation plan. The programs promoted and information provided on the University's Parking and Transportation website include:</p> <ul style="list-style-type: none"><li>• Bus and trolley information with links to schedules;</li><li>• Tips on using alternative traffic routes and parking in areas of campus that are less congested;</li><li>• SDSU's "School Pool", a rideshare program which is free to all students, faculty and staff. Those interested, whether they drive or not, can apply online at <a href="http://www.ridelink.com">www.ridelink.com</a> and are paired with other SDSU commuters who live nearby;</li><li>• "Park and Pedal" information on nearby areas from which students, staff, and faculty can easily ride to campus; and,</li><li>• Additional information on the campus' Red and Black shuttle, Campus Escort Services, and location of resources such as the parking information booth.</li></ul> <p>As future facilities are designed and constructed in accordance with the CSU's new policy on Sustainable Building Practices, the campus will endeavor to improve bicycle transportation on campus, continue to develop programs encouraging alternative modes of transportation, and will work with the City to coordinate our efforts to reduce traffic and facilitate bicycling, carpooling, and public transit.</p>	

Comment I-67-1	Comments from Bob and Mabel Brundage,	Response
After hearing about 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.	As set forth in the project description, the Adobe Falls Faculty/Staff Housing is designed for the exclusive use of faculty and staff. (DEIR pp. 1.0-1 to 1.0-2; 1.0-36 to 1.0-41.) Further, as required by CEQA, the environmental analysis set forth in the Draft EIR is premised on this project description. Any amendment to this description (e.g., converting faculty/staff housing to university student housing) that would alter the environmental impact analysis	

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may warrant further environmental review. Therefore, the Draft EIR itself already provides assurances that the Adobe Falls Faculty/Staff Housing will be used only by faculty and staff.

Comment I-67-2	Comments from Bob and Mabel Brundage,	Response
As far as accessing Smoke Tree's private driveways in the second phase, I am opposed to that notion for the following reasons:		CSU/SDSU acknowledges the commentator's opposition to the proposed project, specifically the Adobe Falls Faculty/ Staff Housing's use of alternate access through the Smoke Tree Condominium Residences. However, the commentator should note that the Smoke Tree access route for the Lower Village component of the Adobe Falls Faculty/Staff Housing was analyzed at the program level and as an alternate access route. (DEIR pp. 5.0-33 to 5.0-49.) The fact that the Draft EIR analyzed this at the program level means that additional environmental review and approval will be required before the Lower Village will be built out and/or access is secured through use of the Smoke Tree community's roads. Upon undertaking this additional environmental review, the roadway capacity of Smoke Tree's roads, the western portion of Adobe Falls Road, and Waring Road will be further evaluated and the proposed project's impacts will be further assessed.
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.		
Our fire lanes are privately funded and we simply cannot afford to repave more often than we already do for our own traffic needs.		The program EIR determined that buildout of the Lower Village may result in anywhere from 600 to 2,800 average daily trips. (DEIR p. 3.14-89.) A field review of the area and a review of area maps reveal that the two roads that will need to carry the majority of project-related traffic are Adobe Falls Road (west) and Waring Road. (DEIR p. 3.14-89.) Both roads have adequate capacity to accommodate the proposed project in addition to existing traffic. (DEIR p. 3.14-90.)

Comment I-67-3	Comments from Bob and Mabel Brundage,	Response
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.		The western segment of Adobe Falls Road is classified as a 2-lane collector roadway pursuant to the City of San Diego's Street Design Manual. Therefore, the total roadway capacity is 6,500 average daily trips ("ADT"). An existing traffic count was conducted on this western segment of Adobe Falls Road, which revealed an existing ADT count of 3,690. Therefore, the segment can accommodate approximately an additional 2,800 ADT and still operate at an acceptable level of service. Since the proposed project is estimated to only add a maximum of 2,800 ADT to this segment of Adobe Falls Road, the impact would be less than significant. (DEIR pp. 3.14-89 to 3.14-90.)
		With regards to the "Levanto condominium project," this related project was considered in the cumulative impacts analysis. At some point during the

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development process, the Levanto condominium project changed names and became known as the William Lyons Homes - Grantville project. (DEIR p. 2.0-4.) As provided in the Draft EIR, the traffic impacts analysis considered the cumulative traffic impacts associated with pending (such as the William Lyons Home - Grantville project) and probable future projects both in the near-term and horizon year analysis. (DEIR p. 3.14-99.)

The other project referenced in the comment appears to be the 36-unit Waring Gardens Apartment expansion project, located at 5320-5340 Adobe Falls Road. This project, according to City of San Diego staff, is presently "on hold." In the event that this expansion project goes forward, any additional vehicle trips that may be generated along Adobe Falls Road, which would presumably be relatively limited given the small size of the expansion project, would be accounted for in the project-level traffic impact analysis for the Lower Village component of the Adobe Falls Faculty/Staff Housing.

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**Comment I-67-4****Comments from Bob and Mabel Brundage,****Response**

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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.

As previously discussed in Response to Comment I67-2, above, in the event the Smoke Tree alternate access route is selected for further consideration, additional environmental review will be conducted with respect to all impact categories, including air quality and aesthetics.

With regards to the potential for visual quality deterioration, the Draft EIR notes that, depending on the location of the access route through the Smoke Tree residences, construction may result in large retaining walls and concrete structures, which may result in visual impacts. (DEIR pp. 5.0-39 to 5.0-40.) These potential visual impacts will be studied in greater detail when project level review is undertaken for the Lower Village component of the Adobe Falls Faculty/Staff Housing. The comment's concern for air quality deterioration is also noted; however, construction related emissions (e.g., those that would result from building a bridge over the flood control channels) are not analyzed until project level review.

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**Comment I-67-5****Comments from Bob and Mabel Brundage,****Response**

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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.

The Draft EIR notes that the Alvarado Creek flows through the proposed site for the Adobe Falls Faculty/Staff Housing, generally from east to west, entering the site via a culvert at the southeastern end, and exiting at the northwest end via a manmade concrete channel -- this northwest exit is near the Smoke Tree residences. (DEIR p. 3.7-10.) The Draft EIR further provides that development of the Adobe Falls Faculty/Staff Housing site would reduce infiltration as a result of an increase in impervious surfaces in

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presently undeveloped areas that either drain to Alvarado Creek or naturally percolate into the soil. The increase in runoff volumes for each storm event represents a potentially significant impact. (DEIR p. 3.7-16.) In response, the Draft EIR includes Mitigation Measure HWQ-2, which requires SDSU to conduct a detailed site-specific hydrologic analysis of the proposed site in order to further assess the effects of the proposed project on the flood plain and, based on that analysis, determine whether on-site detention facilities are needed. This hydrologic analysis would need to occur prior to the preparation of final design plans for the Adobe Falls Faculty/Staff Housing. (DEIR p. 3.7-29.)

Comment I-68-1	Comments from Ron Pephens,	Response
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.		<p>SDSU acknowledges the Del Cerro community's concerns with respect to the potential traffic impacts that may result from development of the Adobe Falls Faculty/Staff Housing. However, as presented in Section 3.14, Transportation/Circulation and Parking, the roadways (including Adobe Falls Road) have sufficient vehicle capacity to accommodate the projected increase in traffic. Therefore, while the Adobe Falls Faculty/Staff Housing will result in additional traffic, the amount of additional traffic can be accommodated by the existing roadway without resulting in a significant impact under CEQA.</p> <p>As to the comment's concern for the "existing uniquely sloped grade" on Adobe Falls Road, this factor was considered in classifying the road's capacity and subsequently analyzing project related impacts. (DEIR p. 3.14-12; see also General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.) Additionally, the Draft EIR acknowledges that vehicle speeds on the Del Cerro roadways, rather than traffic volumes, could be viewed as a potentially significant impact. (DEIR p. 3.14-99.) In response, the Draft EIR proposes Mitigation Measure TCP-23, which requires the preparation of a Traffic Calming Study to determine the methods available to control and/or reduce vehicle speeds on residential roadways in the Del Cerro community. (DEIR p. 3.14-107.) Although the focus of the study will be on the vicinity of the elementary schools near the Del Cerro Boulevard/College Avenue intersection, the area of the Adobe Falls Road grade can be addressed as well. Following completion of the Study, SDSU would be required to contribute its fair-share of the costs to implement feasible traffic calming measures identified in the Study.</p>
Comment I-68-2	Comments from Ron Pephens,	Response
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		The Del Cerro roadway classifications utilized in the Draft EIR traffic impacts analysis, and resulting average daily trip ("ADT") capacity, were determined



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a capacity of only 700 cars, less than one half their 1500 classification.

by the traffic engineer based on an analysis of actual on-site roadway conditions present in the Del Cerro neighborhood, and are consistent with the City of San Diego Street Design Manual, the City of San Diego Traffic Impact Study Manual, and the Navajo Community Plan. Please see General Response 1, Del Cerro Roadway Classifications, for additional information regarding this subject.

Comment I-68-3	Comments from Ron Pephens,	Response
<p>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.</p> <p>There are many more concerns the residents of the area have and J would plead with you to look into. I look forward to your response and thank you in advance for your help.</p>		<p>The EIR traffic impacts analysis recognizes that levels of service ("LOS") calculations are not applied to residential streets since the primary purpose of the streets is to serve abutting lots. (DEIR p. 3.14-12.) Consistent with that principle, the EIR did not use LOS designations to assess significant impacts in the Del Cerro residential community; rather, significant impacts were determined by comparing the "design ADT," as reported in the City of San Diego Street Design Manual, to the sum of the project generated traffic and existing traffic. (See DEIR pp. 3.14-69 to 70.) The roadway design ADT provided the quantitative threshold to utilize in assessing whether the additional project traffic would cause a significant impact on the Del Cerro roadways. The LOS ratings included in the EIR were provided merely for information purposes, to assist the reader in assessing applicable roadway conditions.</p>