

# Appendix A

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Initial Study, Notice of Preparation, and Scoping Comments



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Initial Study

# Evolve Student Housing Project

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**AUGUST 2024**

*Prepared for:*

**THE BOARD OF TRUSTEES OF THE  
CALIFORNIA STATE UNIVERSITY**

401 Golden Shore

Long Beach, California 90802

*Prepared by:*

**SAN DIEGO STATE UNIVERSITY  
FACILITIES PLANNING, DESIGN,  
AND CONSTRUCTION**

5500 Campanile Drive

San Diego, California 92182-1624





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# Acronyms and Abbreviations

Acronym/Abbreviation	Definition
campus	San Diego State University campus
CEQA	California Environmental Quality Act
City	City of San Diego
CSU	The California State University
EIR	environmental impact report
FTE	full-time equivalent
GHG	greenhouse gas
MSCP	Multiple Species Conservation Program
Project or Proposed Project	Evolve Student Housing Project
RWQCB	Regional Water Quality Control Board
SDSU	San Diego State University

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# 1 Introduction

## 1.1 Project Overview

The California State University (CSU)/San Diego State University (SDSU) is proposing the development of two new housing complexes on and adjacent to the main SDSU campus (Project or Proposed Project), which would provide additional student housing, dining, and auxiliary uses on and adjacent to the western and southern portions of campus (see Figures 1 through 3). As noted on the figures, there are two components to the Proposed Project, the Peninsula Component, which is located adjacent to the main SDSU campus at the northern terminus of 55th Street, and the University Towers East Component, which would be located south of Montezuma Road, east and immediately adjacent to the existing University Towers building on the main SDSU campus. The Peninsula Component would be located on an approximately 10.3-acre site adjacent to the northwest portion of campus at the northern terminus of 55th Street, just south of Interstate 8 and west of Canyon Crest Drive. Development of the Peninsula Component would include demolition of all 13 existing buildings, which presently house 702 students, and the phased development of one 9-story student housing building and five student housing buildings up to 13-stories that would contain a total of approximately 4,500 student beds. The proposed University Towers East Component would be developed on a 0.71-acre site located immediately east of the existing University Towers building, south of Montezuma Road. The existing University Towers parking lot would be demolished to allow for redevelopment of the site to include a new 9-story student-housing building that would accommodate approximately 720 beds. In total, development of the Proposed Project would result in 5,220 new student beds (net increase of 4,518 student beds to the main campus inventory).

## 1.2 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA) applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The Proposed Project constitutes a “project” as defined by CEQA (California Public Resources Code, Section 21000 et seq.) and Title 14 of the California Code of Regulations, Section 15000 et seq. (hereafter, “CEQA Guidelines”). CEQA Guidelines Section 15367 states that a “Lead Agency” is “the public agency which has the principal responsibility for carrying out or approving a project.” The Board of Trustees of the CSU is the lead agency for the Proposed Project. SDSU is an entity of the CSU, which is the State of California acting in its higher education capacity.

SDSU has prepared an initial study in accordance with the CEQA Guidelines. The initial study identifies the potential environmental effects associated with the planning, construction, implementation, and operation of the Proposed Project and satisfies the content requirements of CEQA Guidelines Section 15063(d)(1)-(6). Based on the conclusions of the initial study evaluation and pursuant to CEQA Guidelines Section 15063(b)(1)(A), SDSU has determined that there is substantial evidence, in light of the whole record, that the Proposed Project may have a significant effect on the environment. Therefore, SDSU will prepare an environmental impact report (EIR) in accordance with CEQA Guidelines Article 9, Sections 15120 to 15132. This initial study will assist in preparing the EIR by, among other things (1) focusing the EIR on the environmental effects determined to be potentially significant; (2) identifying the effects determined not to be significant; and (3) explaining the reasons for determining that potentially significant effects would not be significant.

As further illustrated below, because the analysis in this initial study determined that the Proposed Project would not result in significant impacts for all environmental categories, SDSU proposes to scope out the following topics from further evaluation in the EIR: Agriculture and Forestry Resources, and Mineral Resources. As such, these topics will not be further analyzed in the EIR.

## 1.3 Public Review Process

In reviewing the initial study, agencies and the interested public should focus on the sufficiency of the document in identifying the potential impacts of the Proposed Project on the environment. Commenters should provide specific detail about the scope and content of the environmental document during this scoping period.

Comments on the Initial Study may be submitted in writing during the 30-day public comment period, between August 23, 2024, and September 23, 2024. All written comments received within 30 days of receipt of the Notice of Preparation will be considered. A copy of the Notice of Preparation and this initial study are available for review on the SDSU website at <https://bfa.sdsu.edu/campus/facilities/planning/eir>. Following the close of the public scoping period, SDSU will consider this initial study and comments thereon in preparing the EIR. Comments on the initial study should be sent to the following address or via email to:

**Kara Peterson, Director of Planning**  
5500 Campanile Drive  
San Diego, California 92182  
[evolvecomments@sdsu.edu](mailto:evolvecomments@sdsu.edu)

## 1.4 Document Organization

This initial study is organized as follows:

**Section 1: Introduction.** This section provides an introduction to the environmental review process. It describes the purpose and organization of this document and presents a summary of findings.

**Section 2: Project Description.** The Project Description section describes the purpose and need for the Proposed Project, identifies Project objectives, and provides a brief description of the Proposed Project.

**Section 3: Initial Study Checklist.** The Initial Study Checklist section presents an analysis of a range of environmental issues identified in the CEQA Environmental Checklist and determines if Project actions would result in no impact, a less-than-significant impact, or a potentially significant impact that will be further analyzed in the Draft EIR.

**Section 4: References and List of Preparers.** The References section lists the references used in preparation of this initial study and identifies report preparers.

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## 2 Project Description

SDSU is proposing to plan, design, and construct two new student housing complexes to be built on and adjacent to the western and southern portions of the main SDSU campus.

### 2.1 Project Location, Setting, and Existing Conditions

The SDSU campus is located along Interstate 8 approximately 8 miles from downtown San Diego (See Figure 1, Regional Map, and Figure 2, Vicinity Map). The campus is located within the College Area community of the City of San Diego (City). The College Area community is characterized by SDSU as a major hub of activity, single- and multi-family residential uses, and neighborhood commercial developments that serve the surrounding community, including SDSU.

The proposed Peninsula Component would be located within the approximately 10.3-acre site at the northern terminus of 55th Street, adjacent to the northwest portion of campus just south of Interstate 8 and west of Canyon Crest Drive (see Figure 3A, Peninsula Project Site). The proposed University Towers East Component would be located on a 0.71-acre site on Montezuma Road that is currently utilized as a parking lot for the existing SDSU University Towers residential housing building (see Figure 3B, University Towers East Project Site).

### 2.2 Campus Planning Background

Founded as a state college in 1897, SDSU initially occupied a single building in downtown San Diego. In February 1930, the SDSU campus was moved to its present location atop Montezuma Mesa and was operated from seven buildings surrounding what is still referred to as the Main Quad. Expansion of the campus initially occurred to the north and southeast. Gradually, the canyon areas were filled with auxiliary uses, including sporting and entertainment venues, as well as parking lots.

By the early 1960s, primarily due to parking concerns and a lack of established functional campus areas, a comprehensive planning effort was deemed necessary for the future expansion of SDSU. The first SDSU Campus Master Plan was prepared by Frank L. Hope and Associates and was approved by the Board of Trustees of the CSU in 1963. The 1963 Campus Master Plan contained a planned land use map, outlined directives for facility placement, and provided target square footage for academic, support, and athletic spaces. An update to the 1963 Campus Master Plan was completed in 1967, and a number of primarily minor revisions were made to the plan throughout the 1970s. Several major revisions have been made to the Campus Master Plan over the last 20 years.

Though historically known as a commuter campus, in recent years SDSU has recognized the academic, accessibility, and community benefits of providing housing to the SDSU students. SDSU has constructed a number of student housing units both on and immediately near campus in an effort to provide increased housing availability for students attending the University. The proposed Project represents SDSU's continuing efforts in this regard.

### 2.3 Project Elements

The Proposed Project would accommodate a net increase of 4,518 beds for students who wish to live on or immediately adjacent to the main SDSU campus. As the existing Campus Master Plan has an enrollment cap of up to

35,000 full-time equivalent (FTE) students, SDSU has not yet reached this enrollment level. The net increase of 4,518 student residents would be newly entering SDSU students or existing students that would transition from living off campus to residential opportunities on or immediately adjacent to campus. These student residents would fall within the 35,000 FTE enrollment envisioned under the existing Campus Master Plan. As part of the Proposed Project, the Campus Master Plan map would be revised as necessary to accommodate the new housing and related facilities.

### 2.3.1 Structures

The site of the Peninsula Component currently contains eight 2-story apartment-style student housing buildings, one 3-story apartment-style student housing building, the SDSU International Center complex comprised of 4 one-story buildings, and associated amenities (i.e., parking spaces, sidewalks, landscaped areas, etc.). Development of the Peninsula Component would include demolition of all 13 existing on-site buildings and the phased development of one 9-story building and five buildings up to 13 stories that would contain a total of approximately 4,500 beds. The 9-story building would include double occupancy rooms, for a total of approximately 650 beds. The five student housing buildings up to 13 stories would be four-bedroom and two-bedroom apartment-style buildings containing approximately 770 beds each. The proposed Peninsula Component would also include a new two-story amenity building for dining and other student retail uses, as well as outdoor gathering space and green space between each building. Demolition of the existing buildings would result in the removal of 702 existing on-site beds and 315 parking spaces. With the loss of 702 existing beds and the development of approximately 4,500 beds, this Proposed Project would result in a net increase of approximately 3,798 beds at the Peninsula site.

The proposed University Towers East Component student housing complex would be developed on a 0.71-acre site located on Montezuma Road currently utilized as a parking lot for University Towers which is an existing student residence building located at 5505 Montezuma Road. The existing parking lot would be demolished to allow for redevelopment of the site to include a new 9-story student housing building that would accommodate approximately 720 beds.

Between the 4,500 beds of the Peninsula Component and the 720 beds of the University Towers East Component, the Proposed Project would result in the development of approximately 5,220 beds.

### 2.3.2 Utilities

It is anticipated that the Proposed Project would require new points of connection for the residence halls and amenity building for domestic water, fire water, and sewer; from the existing utility lines within 55<sup>th</sup> Street for the proposed Peninsula Component, and in Montezuma Road and the alley immediately south for the proposed University Towers East Component.

For the University Towers East site, the existing water, fire water and sewer utility mains within public right of way (Montezuma Rd and alley to south of property) are anticipated to accommodate the increased density for the University Towers project.

For the Peninsula site, water and fire water services are fed through pipelines in 55<sup>th</sup> Street and are expected to be reconstructed to address conflicts with the planned construction and be re-route along the proposed loop road. Water related piping is expected to be upsized as part of the relocation process to address the additional population demand of the project. Sewer for the Peninsula is conveyed through an existing pipe underneath 55<sup>th</sup> Street, this line is expected to be re-routed and upsized to address conflicts with the planned construction. Utility piping running down the canyon's side (sewer and drainage) are not anticipated to be upsized as part of the construction project.

The existing subterranean storm drain system that currently drains both sites would remain unchanged; all post-construction runoff would be drained through existing pipelines and catchment systems and eventually flow into existing City-owned and -operated stormwater systems.

Existing overhead electrical utility lines that are located in both the Peninsula Component site and along/across the University Towers East Component site would be undergrounded during construction. The northernmost portion of 55th Street would be dedicated to SDSU from the City. Temporary access to connect to existing stormwater, water, wastewater, and fire water infrastructure within 55th Street, Montezuma Road, or the alley immediately south of the proposed University Towers East Component would be requested of the City.

### 2.3.3 Landscaping

Due to the adjacency with the undeveloped canyon and hillside areas, all landscaping for the Peninsula Component would be focused on drought-tolerant, low-flammability vegetation. The landscaping proposed for the University Towers East Component would also be characterized by drought-tolerant plant choices.

### 2.3.4 Parking, Circulation, and Access

The residential buildings that are currently on the Peninsula Component support approximately 315 parking spaces. Once all buildings are demolished, approximately 15 parking spaces could be constructed near the entrance of the new housing complex and 2 truck spaces at the amenity building. These 17 spaces would be reserved for accessible parking spaces, staff, short-term parking, and for loading and unloading. Parking for those student residents with vehicles would be available in existing SDSU parking lots and structures. Once constructed, the proposed University Towers East Component would result in a reduction of 125 parking spaces. A total of 6 new parking spaces would be constructed near the entrance of the proposed University Towers East Building. As with the Peninsula component, parking for student residents of the University Towers East Component would be available in existing SDSU parking lots and structures.

Access to the proposed Peninsula Component housing would be provided via 55th Street, which is connected to the larger street grid via Canyon Crest Drive, Remington Road, and Montezuma Road. The new student housing would be fenced to protect against unauthorized access from the surrounding community, and a gate would control access into the Peninsula Component once development is complete.

A multi-use road would be constructed along the outer edge of the proposed 55th Street development. This multi-use road would be primarily designed for pedestrian, bicycle, and other individual motorized vehicles such as scooters, skateboards, hover boards, etc. This road will also be designed to accommodate all required fire truck access needs to ensure that fire-fighting apparatus could access all proposed future buildings. This roadway also would be available for supply delivery, garbage collection, and special event loading and unloading. Daily access to this road for pick-up/drop-off, deliveries or temporary parking would be prohibited.

Additionally, the proposed Central Paseo would be a pedestrian-only pathway connecting all residential buildings within the Peninsula component.

The proposed University Towers East Component would be accessed by Montezuma Road to the immediate north and the unnamed alley to the immediate south of the proposed building.

## 2.3.5 Construction Phasing

Construction of the Project components would occur in multiple phases. The first phase would involve construction of the nine-story residential building and the two-story amenity building within the Peninsula Component, as well as the nine-story tower for the University Towers East Component. Demolition activities at 55<sup>th</sup> Street are assumed to begin in May 2025, with construction of all components and phases to be completed by January 2034.



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# 3 Initial Study Checklist

**1. Project title:**

Evolve Student Housing Project

**2. Lead agency name and address:**

The Board of Trustees of The California State University  
401 Golden Shore  
Long Beach, California 90802

**3. Contact person and address:**

Kara Peterson, Director of Planning  
San Diego State University  
Planning, Design, and Construction  
5500 Campanile Drive  
San Diego, California 92182-1624

**4. Project location:**

The proposed new student housing buildings would be located in and adjacent to the northwestern and southwestern portions of the main SDSU campus. The Peninsula Component would be located immediately adjacent to campus, at the northern terminus of 55th Street. The University Towers East Component would be located immediately east of the existing University Towers Building and south of Montezuma Road.

**5. Project sponsor's name and address:**

San Diego State University  
Planning, Design and Construction  
Kara Peterson, Director of Planning  
5500 Campanile Drive  
San Diego, California 92182-1624

**6. General plan designation (for reference only; not applicable to CSU):**

Peninsula Site: Residential (City of San Diego 2024a)  
University Towers East Site: Residential (City of San Diego 2024a)

**7. Zoning (for reference only; not applicable to CSU):**

Peninsula Site: RM-3-9 (Residential – Multiple Unit) (City of San Diego 2024b)  
University Towers East Site: RM-3-9 (Residential – Multiple Unit) (City of San Diego 2024b)

**8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

Refer to Section 2, Project Description, above, for more information about the Proposed Project.

**9. Surrounding land uses and setting: Briefly describe the project's surroundings:**

Peninsula Component: Surrounding land uses include undeveloped hillsides to the immediate west, north, and east, with existing SDSU campus facilities further east and south.

University Towers East Component: The existing University Towers building is located immediately west of the proposed University Towers East Component site. Montezuma Road is located immediately north, and existing multifamily residential units are located to the east of the proposed site. Single family residential land uses fronting Mary Lane Drive are located south of the Project site.

**10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

The following public agencies may need to issue discretionary or ministerial permits to SDSU for the Proposed Project.

- Division of the State Architect (accessible facilities compliance)
- San Diego Fire-Rescue Department (Office of Fire Safety (OFS))
- San Diego Air Pollution Control Board (authority to construct and/or permits to operate, if necessary)
- City of San Diego (permits for construction within City right-of-way, tie-in to existing City-owned utilities, if necessary).

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

In accordance with California Assembly Bill 52 requirements, SDSU will initiate tribal consultation outreach, the results of which will be summarized in the Draft EIR.

## Environmental Factors Potentially Affected

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

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

### Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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



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Signature

08/23/2024

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Date

### 3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS</b> – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Discussion

The two Project components would be located at separate locations within or adjacent to the SDSU main campus. Development of the Proposed Project would alter the existing visual character at both locations.

On the Peninsula Component site, the proposed construction of the 9-story student housing building, five student housing buildings up to 13 stories, and 2-story amenity building would alter the appearance of the existing site, which currently contains eight 2-story apartment-style student housing buildings, a 3-story apartment-style student housing building, the SDSU International Center complex comprised of 4 buildings, and associated amenities (i.e., parking spaces, sidewalks, landscaped areas, etc.). The proposed development would have the potential to alter visual quality and community character in the area, along with potential increased sources of light and/or glare that may occur as a result of the new buildings.

On the University Towers East Component site, the proposed construction of a new 9-story student housing building would alter the appearance of the existing parking lot. The Proposed Project also would have the potential to alter visual quality and campus character. Changes in land use, such as construction and development of a 9-story housing structure and landscaping in a location currently occupied by a surface parking lot, will have the potential to alter visual quality and community character in the area. Potential increased sources of light and/or glare may also occur as a result of the new building.

A visual resources analysis will be prepared for the Proposed Project that will evaluate the potential construction and operational impacts associated with the development of the Proposed Project, including a visual resources technical report, photographic simulations, and a lighting and shading evaluation.

None of the roadways within proximity of the Proposed Project site are considered Officially Designated State Scenic Highways; however, Interstate 8, located approximately 0.05 miles to the north of the Peninsula Component Project site, is considered an Eligible State Scenic Highway (not officially designated) (Caltrans 2024). The Draft EIR will analyze the potential for the Proposed Project to affect identified scenic vistas, including those that are visible from on-campus vantage points and those that may be affected by views from the surrounding area. The Draft EIR will analyze whether the visual character or quality of the site and its surroundings would be adversely impacted, including potential impacts associated with shading, and will also address any new sources of light and glare to evaluate potential impacts on day or nighttime views in the area as a result of Project implementation.

If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

### 3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>II. AGRICULTURE AND FORESTRY RESOURCES</b> – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

According to the California Important Farmland Finder (California Department of Conservation 2024a), the Project area is designated as Urban and Built-Up Lands. The Project area does not include any lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, development of the Proposed Project would not convert agricultural land to non-agricultural uses. The Project area does not include any land under a Williamson Act contract.

No forest land, timberland, or timberland production areas (as defined in California Public Resources Code Sections 12220 [g], 4526, or 51104 [g]) are located within or adjacent to the Project site. Therefore, the Proposed Project would not conflict with existing zoning for forest land, timberland, or timberland production areas or result in the loss or conversion of forest lands to non-forest uses, as none exist. The Proposed Project would be constructed on previously developed land at the Peninsula Component site and on an existing surface parking lot at the University Towers East site. Impacts to agricultural and forestry resources are not anticipated to occur as a result of development of the Proposed Project and potential impacts to agricultural resources will not be discussed further in the Draft EIR.

## 3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY</b> – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

The Project site is located within the San Diego Air Basin under the jurisdiction of the San Diego Air Quality Management District. The San Diego Air Quality Management District is the local agency responsible for the administration and enforcement of air quality regulations for the area. Construction and operation of the Proposed Project may result in the emission of additional short- and long-term criteria air pollutants from mobile and/or stationary sources, which may exceed federal and state air quality standards or contribute to existing nonattainment of air quality standards. In addition, the proposed development, combined with known and reasonably foreseeable growth in the area, could result in cumulatively considerable emissions of nonattainment criteria air pollutants.

Construction activities associated with the Proposed Project would result in temporary sources of fugitive dust and construction vehicle emissions. Earthwork and construction-related activities would also result in the emission of diesel fumes and other odors typically associated with construction activities. Sensitive receptors located in the vicinity of the construction site, including on-campus residences and off-site residences, may be affected. Any odors associated with construction activities would be temporary and would cease upon Project completion. Long-term operation of the Proposed Project would result in daily vehicular trips and energy consumption (e.g., heating and air conditioning), both of which would generate emissions, although it is anticipated that vehicle trips to and from student residences would decrease because of the increased number of students who would now live within walking distance of their classes, thus eliminating the need for a vehicle. Analysis of the Proposed Project’s potential air quality impacts and related mitigation measures will be provided in the Draft EIR. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

## 3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES – Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

The Peninsula Component site consists of 10.3 acres of developed land and is adjacent to undeveloped habitat. The University Towers East Component is located on a 0.71-acre developed site and is surrounded by development. The Proposed Project may affect the hillsides surrounding the Peninsula Component site, which are known to support special-status wildlife species such as the coastal California gnatcatcher (*Poliioptila californica californica*). Additionally, the Peninsula Component site is located within the planning area of the City of San Diego Multi-Species Conservation Program (MSCP) Subarea Plan and specifically within an area designated as Multi-Habitat Plan Area. Although SDSU is not a “permittee” under this umbrella plan/City Subarea Plan, the significance of the Proposed Project’s location within the MSCP area and within an area designated as Multi-Habitat Plan Area will be addressed in the EIR. A comprehensive biological resources evaluation will be prepared in conjunction with the Draft EIR; this evaluation will include vegetation mapping and field surveys. All biological resources, including vegetation communities and special-status biological resources observed or with potential to occur on site, will be addressed in this analysis.

Ornamental trees and shrubs that may provide suitable habitat for urban-adapted birds are located on and adjacent to the Project site. Breeding birds can be affected by short-term construction noise, which can result in the disruption of foraging, nesting, and reproductive activities. The Draft EIR will address potential impacts to these birds.

As discussed, a comprehensive biological resources technical memorandum will be prepared as part of the Proposed Project, the findings of which will be included in the EIR. Direct, indirect, and cumulative impacts for both short-term and long-term effects of the Proposed Project will be evaluated. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

### 3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES – Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Discussion

The proposed Peninsula Component would involve demolition of the existing structures and grading. A cultural resources memorandum, which will include a historical resource evaluation, will be prepared. Should any archaeological resources be discovered requiring recordation during field surveys, a full Archaeological Resource Management Report may be necessary. Potential impacts associated with the presence of human remains on the site of the Proposed Project will also be addressed. Additionally, the EIR will describe existing historical resources and determine if any historical resources have the potential to be affected by implementation of the Proposed Project. If applicable, mitigation measures to reduce or avoid potentially significant impacts will be identified in the Draft EIR.

### 3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. Energy</b> – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Discussion

Implementation of the Proposed Project would result in use of energy resources during Project construction activities and once the new residential buildings are operational. An air quality, greenhouse gas (GHG) emissions, and energy technical report will be prepared for the Proposed Project, the results of which will be described in the Draft EIR. As such, the Draft EIR will evaluate impacts related to the Proposed Project’s consumption of energy resources and the Proposed Project’s potential to conflict with applicable adopted plans for renewable energy or energy efficiency and will identify mitigation measures (if necessary).

### 3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS</b> – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

The Project site is located within seismically active Southern California, an area where several faults and fault zones are considered active by the California Division of Mines and Geology. Due to the presence of faults within proximity to the Project area and the questionable activity level of these faults, the potential for ground rupture to occur on the Project site resulting in damage from surface rupture or fault displacement would be a potentially significant impact. All new building design projects are required to be consistent with the California Building Code and the CSU Seismic Policy, which mandates, in part, that all new structures must provide an acceptable level of earthquake safety for students, employees, and the public who occupy these buildings and facilities, to the extent feasible (CSU 2016). The Draft EIR and geotechnical report to be prepared for the site will evaluate the potential hazard from ground failure and liquefaction and evaluate seismic hazard maps to identify the proximity and level of potential hazard from earthquake faults and other known faults. The EIR will also analyze the potential for landslides, lateral spreading, subsidence, liquefaction, or collapse to occur on or off campus.

Construction activities associated with the Proposed Project, including grading, would temporarily expose underlying soils, thereby increasing the potential to cause soil erosion or the loss of topsoil. The Draft EIR will examine the potential for erosion hazards and the loss of topsoil where development is proposed to occur and describe the Project design features and/or mitigation incorporated to reduce or avoid these impacts.

Septic tanks or alternative wastewater disposal systems are not proposed.

Should any paleontological resources be discovered requiring recordation during field surveys, a full Paleontological Resource Management Report may be necessary. Applicable mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

### 3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS – Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Discussion

GHG emissions would be generated from construction and operation of the Proposed Project. Construction activities would result in GHG emissions from heavy construction equipment, truck traffic, and worker trips to and from the Project site. Operation of the Proposed Project would generate GHG emissions associated with new buildings (natural gas, purchased electricity), water consumption, and vehicle emissions. The Draft EIR will identify the sources of construction and operational GHG emissions, as well as the Project Design Features that would be incorporated to reduce emissions from area sources (e.g., energy use) and reduce emissions from vehicles.

Consistent with the CEQA Guidelines, Section 15064.4, the EIR will describe, calculate, or estimate the amount of GHG emissions associated with the Proposed Project. Mitigation measures will be identified, as necessary, to reduce or avoid potentially significant global climate change impacts resulting from construction or operational GHG emissions.

### 3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, cleaning products, landscaping chemicals and fertilizers, and solvents, would be used on site for construction and maintenance. These materials, which would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials, will be addressed in the Draft EIR. The University Towers East Component area includes a parking lot that most likely has vehicular oil residue. Construction activities at the Project site could potentially encounter contaminated soils and could result in the accidental release of hazardous materials to the environment and release of materials within 0.25 mile of an existing school (SDSU, Hardy Elementary School, and College Park Preschool). The Draft EIR will address these potential impacts and provide mitigation to reduce or avoid potentially significant impacts, as appropriate.

The Project site is not located within an airport land use plan, nor is it located within 2 miles of a public airstrip (the closest airport is Montgomery Field, located approximately 4 miles northwest of the Project site). Therefore, hazards associated with airports will not be discussed further in the Draft EIR.

The increase in students living within the Peninsula site and the University Towers East site that would result with implementation of the Proposed Project would potentially affect implementation of an emergency response or evacuation plan. The Draft EIR will address these potentially significant impacts. Ornamental landscaping is present within the Project area, in addition to areas of natural vegetation. Due to the presence of natural vegetation and wildland area immediately on and adjacent to the site, the potential for wildland fires exists. The Draft EIR will address the existing conditions and analyze the potential for development of the Proposed Project to adversely affect people or structures as a result of wildland fires. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

### 3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY – Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

During construction activities, gasoline, diesel fuel, lubricating oils, grease, and solvents may be used on the Project site. Accidental spills of these materials during construction activities could result in potentially significant water quality impacts. In addition, soils loosened during excavation and grading could degrade water quality if mobilized and transported off site via water flow. Because construction activities may occur during the rainy season or during a storm event, construction of the Proposed Project could result in adverse impacts to water quality without incorporation of a stormwater pollution prevention plan and implementation of appropriate best management practices. Once operational, the primary source of pollutants would be impervious areas such as any pavement and any chemicals used for landscaping. Because the Proposed Project would involve redevelopment of existing impervious surfaces, the operational impacts would be similar to existing conditions. The Draft EIR will evaluate the potential impacts of the Proposed Project, including proposed pipelines and improvements, on surface water quality and groundwater hydrology and will provide mitigation as appropriate. The Draft EIR will also evaluate any potential impacts to groundwater recharge.

The Project site is within Flood Zone X, which is considered an area of minimal flood hazard (FEMA 2020; SANDAG 2024). The Project site will not expose people or structures to a significant risk due to flooding as the result of the failure of a levee or dam due to the elevation of the Project site compared to the nearest dam (Lake Murray). The Project area exhibits a low potential for inundation by seiche or tsunami due to its location approximately 10 miles east of the Pacific Ocean. As such, no further discussion regarding these potential impacts will be provided in the Draft EIR.

A hydrology and water quality evaluation will be prepared for the Draft EIR that will evaluate the impacts of the Proposed Project and improvements on surface water quality, groundwater hydrology, and related water quality issues and will provide mitigation as appropriate. Impacts to local storm drain systems and adjacent land uses as a result of flooding and runoff will be evaluated. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.



### 3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING</b> – Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Discussion

An existing land use, planned land use, and applicable policy and guideline analysis will be prepared for the EIR, taking into consideration SDSU’s state agency status and the appropriate application, if any, of local land use planning under the circumstances. SDSU is not a signatory or participant in the City’s MSCP Subarea Plan; it is therefore not subject to the requirements of this planning tool , but a portion of City’s Multi-Habitat Plan Area has been designated over the Peninsula Project component. Although SDSU is not subject to the MSCP Subarea Plan, the requirements of the plan, nor MHPA guidelines, the EIR will outline the proposed Project’s consistency with the plan for informational purposes.

### 3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES</b> – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Discussion

The Project site is located within Mineral Resource Zone 3, as shown on Figure CE-6, Generalized Mineral Land Classification, in the Conservation Element of City of San Diego General Plan (City of San Diego 2024a). The Mineral

Resource Zone 3 classification indicates areas of known or inferred mineral resources, the significance of which is undetermined based on available data (California Department of Conservation 2024b). Although the significance of mineral resources in the area has yet to be identified, the campus does not contain locally important resource recovery sites due to its lack of lowland valleys and washes, which tend to support mineral resource deposits, nor does the area underlying Montezuma Road and its environs in the area of the Proposed Project. As such, mineral resources will not be discussed further in the Draft EIR.

### 3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIII. NOISE</b> – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Discussion

Potential increases in existing noise levels would be associated with certain aspects of the Proposed Project, including the introduction of a greater number of student residents at the Peninsula Component site and introduction of student housing buildings into an area currently used as a parking lot at the University Towers East Component site. Construction of the Proposed Project may also introduce nuisance noise and groundborne vibration and noise to the area. Once operational, the Proposed Project may result in additional sources of noise from outdoor mechanical equipment associated with new buildings, facilities, and utility improvements. A noise analysis will be conducted that will evaluate the effects of construction activities, building operations, and altered traffic patterns on nearby sensitive receptors and will document any substantial increases to existing ambient or community noise equivalent levels that would occur. The Draft EIR will evaluate whether implementation of the Proposed Project would expose people to noise and/or groundborne vibration levels in excess of applicable standards. The Draft EIR will also analyze any temporary or permanent increase in noise levels generated from construction operational activities, identify any construction and/or operational noise impacts that would result from implementation of the Proposed Project, and provide appropriate mitigation to reduce or avoid any potentially significant impacts.

The Project site is not located within an airport land use plan or within 2 miles of a public or private use airport, nor is it located within 2 miles of a public airstrip (the closest airport is Montgomery Field, located approximately 4 miles from the Project site). Therefore, the Proposed Project would not result in potential impacts related to these issues, and they will not be discussed in the noise analysis or in the Draft EIR. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

### 3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING – Would the project:</b>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Discussion

The Proposed Project would result in the construction of new student housing facilities on or immediately adjacent to the main SDSU campus. The phased development of the Proposed Project would result in a temporary loss of approximately 76 student beds before the newly construction student housing buildings are complete. These student beds would be temporarily relocated throughout the other available campus student housing options during construction. Once construction is complete, the Proposed Project would result in a total of 5,220 beds and a net increase of 4,518 student beds.

The above notwithstanding, the Proposed Project would serve current and future SDSU students that would be contained within the Campus Master Plan’s 35,000 FTE enrollment level. Potential impacts regarding population and housing will be addressed further in the Draft EIR. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

### 3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XV. PUBLIC SERVICES** – Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Discussion

While most university-related public services are provided by SDSU itself, a discussion of the Proposed Project’s impact on existing police, fire, school, parks, and library facilities will be included in the Draft EIR. The EIR will evaluate whether implementation of the Proposed Project will increase demand for these public services and will compare the increased demand with existing and planned equipment and staffing levels. The environmental impacts of any potential capacity shortage will be evaluated in the Draft EIR. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

### 3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XVI. RECREATION**

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

Existing athletic, recreational, and open space areas are provided on campus for use by students and the campus community. Although there would be a net increase of 4,518 resident students on or immediately adjacent to the main SDSU campus, once the new student housing buildings are constructed, it is not expected that the increase in student residents would result in a substantial increase in the use of local park and recreational facilities. Students living in the new student housing facilities would have access to campus recreation facilities (such as the Aztec Center) and open space areas as they do today. Resident students are not expected to use non-SDSU parks and recreation facilities while living at the new student housing sites beyond levels that on-campus community members currently use these off-campus facilities. Accelerated physical deterioration of City park and recreation facilities are not anticipated to occur as a result of the Proposed Project. Nonetheless, the environmental impacts of potential use and/or strain on local recreational facilities will be evaluated in the Draft EIR. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

### 3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION – Would the project:</b>				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

A transportation impact analysis will be prepared for the Proposed Project in conjunction with the Draft EIR. The analysis will address potential impacts associated with the Proposed Project’s consistency with applicable plans addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; vehicle miles traveled, as required by CEQA Guidelines section 15064.3, subdivision (b); potential increased hazards due to a geometric design feature(s); and emergency access and evaluation. If applicable, mitigation measures to reduce or avoid potentially significant impacts will be identified in the Draft EIR.

### 3.18 Tribal Cultural Resources

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

#### Discussion

The Project area currently supports multistory buildings, parking lots, and associated amenities (i.e., parking spaces, sidewalks, landscaped areas, etc.). A cultural resources record search will be conducted at the South Coast Information Center at SDSU, a Sacred Lands File request made of the Native American Heritage Commission in Sacramento, and contact made with all Native American tribes known to have occupied or used lands within the Project area, consistent with the requirements of AB 52, to determine the potential extent of tribal cultural resources in the Project area. Once these resources are known, the analysis will determine whether potential significant impacts could occur to tribal cultural resources. The results of the tribal cultural resources analysis will be included in the cultural resources technical report. If applicable, mitigation measures to reduce or avoid potentially significant impacts will be identified in the Draft EIR.

### 3.19 Utilities and Service Systems

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

#### Discussion

New facilities proposed in connection with the Proposed Project will necessitate public utilities, such as electricity, natural gas, communication systems, water, sewer, and stormwater drainage. Electric, heating, and air conditioning demands for the Proposed Project and potential capacity expansion and associated environmental impacts related to these utility demands will be analyzed in the Draft EIR. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

### 3.20 Wildfire

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

#### Discussion

The Peninsula Component site is located within an area designated as a Very High Fire Hazard Severity Zone. The University Towers East Component site is located near a Very High Fire Hazard Severity Zone but not within this zone. As discussed in Section 3.9, Hazards and Hazardous Materials, the increase in students living on campus that would result with implementation of the Proposed Project would potentially affect implementation of an emergency response or evacuation plan. The Draft EIR will address these potentially significant impacts. Due to the presence of natural vegetation, ornamental landscaping, and wildland area immediately on and adjacent to the site, the potential for wildland fires exists. The Draft EIR will address the existing conditions and analyze the potential for development of the Proposed Project to adversely affect people or structures as a result of wildland fires.

Because it is anticipated that the Proposed Project would require new points of connection for some of the residence halls for domestic water, fire water, and sewer from the existing utility lines, potential impacts related to exacerbation of fire risk through installation or maintenance of infrastructure will be further evaluated in the Draft EIR.

As described in Section 3.10, Hydrology and Water Quality, the Project site is located within Zone X, which is considered an area of minimal flood hazard. However, implementation of the Proposed Project could have the potential to expose people or structures to post-fire risks as a result of runoff, post-fire slope instability, or drainage



changes. Therefore, impacts will be further evaluated in the Draft EIR. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

### 3.21 Mandatory Findings of Significance

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

#### Discussion

The Proposed Project would not directly affect the hillsides surrounding the site, which may potentially support populations of rare, threatened, or endangered plant or animal species or sensitive plant communities. However, a biological resources evaluation will be prepared in conjunction with the Draft EIR, which will disclose all biological resource impacts. Further, an analysis of archaeological and historical resources present on site and potential effects on such resources will be conducted in conjunction with preparation of the Draft EIR. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

A cumulative impacts analysis will be conducted for each environmental topic area discussed in depth in the EIR. Potentially significant cumulative impacts may result. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.

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## 4 References and Preparers

### 4.1 References Cited

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### 4.2 List of Preparers

#### California State University

Anne Collins-Doehne, Principal Planner

## **San Diego State University**

Robert Schulz, University Architect  
Kara Peterson, Director of Planning  
Amanda Alpiner, Planner  
Amanda Scheidlinger, Construction Manager  
Paul Jackson, Program Manager  
Erin Rogers, Program Manager

## **Dudek**

Sarah Lozano, AICP, Principal  
Cori Resha, Senior Planner  
Emily Seklecki, Project Manager  
Tuesday Christopher, Environmental Planner  
Mollie Brogdon, Environmental Planner  
Jennifer Garman, Editor  
Lesley Terry, GIS Specialist

## **Gensler**

Rich King, Principal Architect  
Nick Alanen, Associate Architect  
Darrel Fullbright, Principal Designer

## **Swinerton Construction**

Liz Hawkins, Vice President  
Alejandro Rivera, Project Manager

## **OCMI**

Justin Dorsey, Director of Construction Management  
Natalie Stenger, Planner

## **Gatkze Dillon & Ballance**

Michael Haberkorn, Attorney

## **Linscott, Law and Greenspan**

John Boarman, Principal  
Amelia Giacalone, Senior Transportation Planner



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- Project Site
- SDSU Campus Boundary

0 500 1,000 Feet

SOURCE: AERIAL - SANGIS IMAGERY 2023

# SDSU Evolve Student Housing



**Figure 2**  
**Vicinity Map**



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**SDSU Evolve Student Housing**



**Figure 3A  
Peninsula Project Site**



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**SDSU Evolve Student Housing**



**Figure 3B**  
**University Towers East**  
**Project Site**

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**NOTICE OF PREPARATION  
OF DRAFT ENVIRONMENTAL IMPACT REPORT;  
NOTICE OF PUBLIC INFORMATION/SCOPING MEETINGS;  
SAN DIEGO STATE UNIVERSITY  
EVOLVE STUDENT HOUSING PROJECT**

***Prepared for:***

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

***Prepared by:***

San Diego State University  
Facilities Planning, Design, and Construction  
5500 Campanile Drive  
San Diego, California 92182-1624

August 23, 2024

**NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT;  
NOTICE OF PUBLIC INFORMATION/SCOPING MEETINGS**

**To:** State of California  
Office of Planning and Research  
State Clearinghouse  
1400 Tenth Street  
Sacramento, California 95812

**From:** The Board of Trustees of the  
California State University  
Kara Peterson, Director of Planning  
Planning, Design & Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California 92182-1624

The Board of Trustees of the California State University (CSU), which is the State of California acting in its higher education capacity, will be the lead agency for the preparation of an environmental impact report (EIR) in accordance with the California Environmental Quality Act (CEQA; Public Resources Code section 21000 *et seq.*), and Title 14 of the California Code of Regulations section 15000 *et seq.* (hereafter “CEQA Guidelines”). The EIR will address the potential environmental effects associated with construction and development of the proposed Evolve Student Housing Project (Proposed Project) to be constructed on and adjacent to the main campus of San Diego State University (SDSU) in San Diego. The Proposed Project would consist of two separate student housing complexes to be developed at two different locations within and adjacent to SDSU’s main campus. The two complexes are referred to herein as the Peninsula Component and the University Towers East Component, and collectively comprise the Project site. (See NOP **Figure 1**, Regional Map and **Figure 2**, Vicinity Map). CSU/SDSU has prepared and distributed this Notice of Preparation (NOP) in accordance with CEQA Guidelines section 15082(a) to provide responsible and trustee agencies, the Office of Planning and Research, and county clerk with sufficient information describing the project and the potential environmental effects to enable the responsible agencies to provide a meaningful response relative to preparation of the EIR.

**Project Description and Location:** The proposed Peninsula Component student-housing complex would be located within the approximately 10.3-acre site located adjacent to the northwest portion of campus where 55th Street ends, just south of Interstate-8 and west of Canyon Crest Drive. (See NOP Figure 2, Vicinity Map.) The Peninsula site currently contains eight, two-story apartment-style student housing buildings, one three-story apartment-style student housing building, the SDSU International Center complex comprised of four buildings, and associated amenities (i.e., parking spaces, sidewalks, landscaped areas, etc.). Development of the Peninsula Component would include demolition of all 13 existing onsite buildings, which would include removal of 702 beds and 315 parking spaces, and the phased development of one 9-story building and five buildings up to 13-stories that would contain a total of approximately 4,500 beds to house university students. The 9-story building would contain approximately 650 beds, and the other five



maximum 13-story buildings would be 4-bedroom and 2-bedroom apartment-style buildings containing approximately 770 beds each. The proposed Peninsula Component would also include a new two-story amenity building for dining and other student uses, and outdoor gathering space and green space between each building. With the loss of 702 existing beds and the development of approximately 4,500 beds, this Proposed Project would result in a net increase of approximately 3,798 beds at the Peninsula site.

The proposed University Towers East Component student-housing complex would be developed on a 0.71-acre site located on Montezuma Road currently utilized as a parking lot at 5505 Montezuma Road (See Figure 2, Vicinity Map.). The existing parking lot would be demolished to allow for redevelopment of the site to include a new 9-story student-housing building that would accommodate approximately 720 beds.

Between the 4,500 beds of the Peninsula Component and the 720 beds of the University Towers East Component, the Proposed Project would result in the development of approximately 5,220 beds.

**List of Probable Environmental Effects:** The Proposed Project would potentially affect the following environmental impact categories, which will be addressed in the Draft EIR: aesthetics, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, noise, population/housing, public services, transportation, tribal cultural resources, utilities/service systems, and wildfire. A more detailed description of the potential environmental effects associated with development of the Proposed Project is provided in the Initial Study. A copy of this NOP and the Initial Study are available for review on the SDSU website at <https://bfa.sdsu.edu/campus/facilities/planning/eir>.

**Agency/Public Responses:** By this NOP, CSU is seeking public and agency input regarding the scope and content of the environmental information to be contained in the Draft EIR. Any responsible or trustee agency may need to use the EIR when considering permits or other project approvals. The failure to respond to this notice, or otherwise object to the conclusions made in the accompanying Initial Study, may prevent later assertions that issues excluded by the Initial Study should have been included in the Draft EIR.

Consistent with CEQA Guidelines section 15082, all responses to this NOP must be sent at the earliest possible date, but not later than 30 days after receipt of this notice. All written comments received on or before 5:00 p.m. PST September 23, 2024, will be considered. Please send your written response to [evolvecomments@sdsu.edu](mailto:evolvecomments@sdsu.edu). Please provide the name of the contact person for commenting parties or agencies. Written responses may also be sent via mail to Kara Peterson,

**Notice Of Preparation of a Draft Environmental Impact Report;  
Notice of Public Information/Scoping Meetings**

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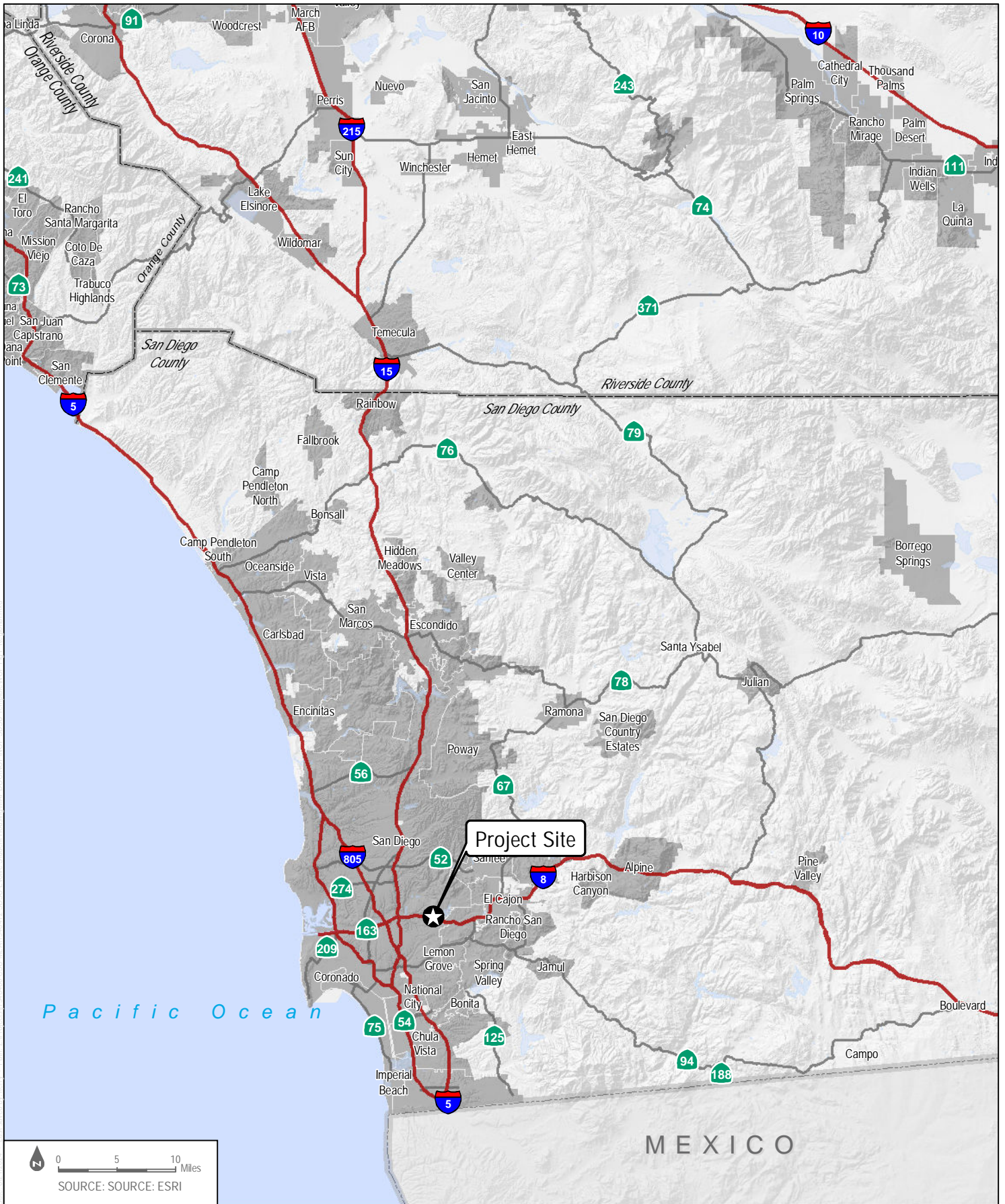
Director of Planning; Planning, Design, and Construction; SDSU, 5500 Campanile Drive, San Diego, California 92182-1624.

**Public Information/Scoping Meeting:** CSU will hold public information/scoping meetings to discuss the Proposed Project in order to obtain information regarding the content and scope of the Draft EIR. The meeting(s) will take place as follows:

- September 4, 2024 – 5:30 p.m. to 7:00 p.m. at Montezuma Hall (located at the Conrad Prebys Aztec Student Union, 6075 Aztec Circle Drive, San Diego, California 92182)
- September 5, 2024 – 3:00 p.m.– 4:00 p.m. via Zoom webinar: <https://bit.ly/4dVgXVO>

All public agencies, organizations, and interested parties are encouraged to attend and participate at the meetings. The failure of any public agency, organization, or interested party to attend the scoping meetings or submit written comments may prevent that agency, organization, or party from later asserting that issues excluded by the Initial Study should have been included in the Draft EIR.





**SDSU Evolve Student Housing**



**Figure 1  
Regional Map**





- Project Site
- SDSU Campus Boundary

0 500 1,000 Feet

SOURCE: AERIAL - SANGIS IMAGERY 2023

# SDSU Evolve Student Housing



**Figure 2**  
**Vicinity Map**



## SDSU Evolve Student Housing CEQA Process

### Summary of Scoping Comments

Commenter	Date	Summary of Environmental Issues Raised	EIR Chapter/ Section Where Comment is Addressed
<b>Agencies</b>			
Native American Heritage Commission (NAHC)	August 29, 2024	<ul style="list-style-type: none"> <li>Recommendation to consult with California Native American tribes in the area</li> </ul>	Section 4.4, Cultural Resources and Tribal Cultural Resources
Department of Toxic Substances Control (DTSC)	September 4, 2024	<ul style="list-style-type: none"> <li>Recommendation that imported material is tested to assess any contaminants of concern</li> <li>For buildings that are to be demolished, recommendation that surveys are conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk</li> </ul>	Section 4.8, Hazards and Hazardous Materials
San Diego County Hazardous Materials Division (HMD), Rita Raphael	September 10, 2024	<ul style="list-style-type: none"> <li>Requirement to submit a Hazardous Materials Questionnaire to the HMD and complete a HMD Hazardous Materials Plan Check review</li> <li>Provides summary of hazardous material requirements if the Project would store a volume greater than or equal to 55 gallons, 500 pounds or 200 cubic feet each</li> <li>Provides summary of hazardous waste requirements</li> <li>Provides summary of above ground petroleum storage requirements</li> <li>Requirements for handling contaminated soil</li> </ul>	Section 4.8, Hazards and Hazardous Materials
California Department of Transportation (Caltrans)	September 18, 2024	<ul style="list-style-type: none"> <li>Request to include traffic engineering and analysis in the EIR</li> <li>Request for specific hydraulics information in the EIR</li> <li>Informs applicant about traffic noise regulations associated with Interstate 8</li> <li>Recommendation to incorporate discussion of various planning documents and transportation-related projects</li> <li>Request to be indicated as a Responsible Agency in the EIR</li> <li>Requirements for projects withing Caltrans Right-of-Way</li> </ul>	Section 4.14, Transportation
California Department of Fish and Wildlife (CDFW)	September 23, 2024	<ul style="list-style-type: none"> <li>Recommendation to evaluate the Project's indirect impacts to the adjacent Multi-Habitat Planning Area (MHPA) and address consistency with the City of San Diego's Land Use Adjacency Guidelines (LUAG)</li> <li>Request for the EIR to evaluate impacts to Coastal California gnatcatcher</li> <li>Request for the EIR to fully disclose Project impacts related to plant and wildlife species</li> </ul>	Chapter 2, Project Description; Section 4.3, Biological Resources; Section 4.9, Hydrology and Water Quality; Chapter 6, Alternatives

## SDSU Evolve Student Housing CEQA Process

### Summary of Scoping Comments

Commenter	Date	Summary of Environmental Issues Raised	EIR Chapter/ Section Where Comment is Addressed
		<ul style="list-style-type: none"> <li>Request for the EIR to include specific Project description and alternatives discussion</li> <li>Request for various specific impact analysis pertaining to biological resources and hydrology</li> <li>Recommendation to use native plant palette for landscaping</li> <li>Request to report species detected during project surveys into databases</li> </ul>	
<b>Individuals</b>			
Shanika Mcallister	August 27, 2024	<ul style="list-style-type: none"> <li>Question regarding whether the Project includes graduate housing</li> </ul>	Chapter 2, Project Description; Section 4.12, Population and Housing
Esteban Gomez	August 27, 2024	<ul style="list-style-type: none"> <li>Request for on-campus housing to be for “disadvantaged” students and to be affordable</li> </ul>	Chapter 2, Project Description; Section 4.12, Population and Housing
Debra Brown	August 28, 2024	<ul style="list-style-type: none"> <li>Concern regarding parking</li> <li>Question about student housing capacity and affordability</li> <li>Question about Snapdragon Stadium land dormitories</li> </ul>	Chapter 2, Project Description; Section 4.12, Population and Housing; Section 4.14, Transportation
Guthre Leonard	August 29, 2024	<ul style="list-style-type: none"> <li>Request for recorded zoom meeting or access to Project overview slides</li> </ul>	N/A
Mark Nelson (1)	August 30, 2024	<ul style="list-style-type: none"> <li>Inquiry about receiving the Notice of Preparation (NOP)</li> </ul>	N/A
Mark Nelson (2)	August 30, 2024	<ul style="list-style-type: none"> <li>Inquiry about the State Clearinghouse number, formal NOP, and remote access to Project information</li> </ul>	N/A
Hayley Irwin	September 4, 2024	<ul style="list-style-type: none"> <li>Questions regarding sustainability plans</li> </ul>	Section 4.5, Energy
Wesley Cooksy	September 4, 2024	<ul style="list-style-type: none"> <li>Request for traffic circles on 55th Street</li> <li>Request for bike/skateboard storage</li> <li>Request to evaluate wildfire mitigation and evacuation strategies</li> <li>Request for buildings to be Leadership in Energy and Environmental Design (LEED) Gold</li> <li>Request for shuttle/ San Diego Metropolitan Transit System (MTS) shuttle stop</li> </ul>	Chapter 2, Project Description; Section 4.5, Energy; Section 4.14, Transportation; Section 4.16, Wildfire
Ann Cottrell	September 4, 2024	<ul style="list-style-type: none"> <li>Concern about evacuation plans</li> <li>Concern about parking</li> <li>Concern about construction/EIR schedule overlap</li> </ul>	Chapter 2, Project Description; Section 4.14,

## SDSU Evolve Student Housing CEQA Process

### Summary of Scoping Comments

Commenter	Date	Summary of Environmental Issues Raised	EIR Chapter/ Section Where Comment is Addressed
			Transportation; Section 4.16, Wildfire
Karen Jorgensen (1)	September 4, 2024	<ul style="list-style-type: none"> <li>• Question about existing parking in Lot 12</li> <li>• Concern about construction vehicles</li> <li>• Concern about parking and traffic impacts</li> <li>• Request to build in Mission Valley</li> <li>• Concern about fire evacuation plan</li> <li>• Request to expand parking permit “B”</li> <li>• Concern about noise and quality of life impacts</li> <li>• Question about infrastructure upgrades</li> </ul>	Section 4.11, Noise; Section 4.14, Transportation; Section 4.15, Utilities and Service Systems; Section 4.16, Wildfire
Maximilian Ludena	September 4, 2024	<ul style="list-style-type: none"> <li>• Concern about building size/ADA accessibility</li> </ul>	Chapter 2, Project Description
Diego Martinez	September 4, 2024	<ul style="list-style-type: none"> <li>• Request for bicycle parking, improved bicycle infrastructure, mixed-use buildings, and commercial amenities</li> </ul>	Chapter 2, Project Description; Section 4.14, Transportation
Brandon Reynolds	September 4, 2024	<ul style="list-style-type: none"> <li>• Recommendation for alternatives sites</li> <li>• Request for roundabouts</li> <li>• Request for size reduction</li> <li>• Recommendation for sustainable rainwater harvesting</li> </ul>	Section 4.9, Hydrology and Water Quality; Section 4.14, Transportation; Chapter 6, Alternatives
Tom Silva (1)	September 4, 2024	<ul style="list-style-type: none"> <li>• Request for EIR to describe emergency evacuation plan</li> <li>• Question about rent cost</li> <li>• Question about parking plan/on-site parking</li> <li>• Request to improve pedestrian and bike lanes</li> </ul>	Section 4.8, Hazards and Hazardous Materials; Section 4.14, Transportation; Section 4.16, Wildfire
Tom Silva (2)	September 4, 2024	<ul style="list-style-type: none"> <li>• Request for baseline student housing data for SDSU campus</li> </ul>	Section 4.12, Population and Housing
Fran Greenstein	September 5, 2024	<ul style="list-style-type: none"> <li>• Question about keeping informed about the Project</li> </ul>	N/A
Mark Nelson (3)	September 5, 2024	<ul style="list-style-type: none"> <li>• Concern about zoning violation</li> </ul>	Section 4.10, Land Use and Planning
Chris Schultz	September 6, 2024	<ul style="list-style-type: none"> <li>• Concern about parking</li> </ul>	Section 4.14, Transportation
Anne McMills	September 8, 2024	<ul style="list-style-type: none"> <li>• Request for graduate housing</li> <li>• Request for year-round housing</li> <li>• Request for competitive down-payment process</li> </ul>	Chapter 2, Project Description

## SDSU Evolve Student Housing CEQA Process

### Summary of Scoping Comments

Commenter	Date	Summary of Environmental Issues Raised	EIR Chapter/ Section Where Comment is Addressed
María Zúñiga	September 9, 2024	<ul style="list-style-type: none"> <li>Suggestion for housing to support students in recovery from substances/alcohol and those who prefer not to consume</li> </ul>	N/A
Christina Brown	September 9, 2024	<ul style="list-style-type: none"> <li>Suggestion to add a field into the scope</li> </ul>	N/A
Lisa Marun	September 10, 2024	<ul style="list-style-type: none"> <li>Request for the Project to connect with nature and the environment</li> <li>Suggestions to avoid heat island effect</li> <li>Request to support native habitat expansion</li> <li>Questions about the planning process and SDSU community participation</li> </ul>	Section 4.3, Biological Resources; Section 4.7, Greenhouse Gas Emissions
Carla Conner	September 13, 2024	<ul style="list-style-type: none"> <li>Concern about fire risk due to smoking and only one way out of cul-de-sac street</li> <li>Hope for a new fire station</li> </ul>	Section 4.13, Public Services and Recreation; Section 4.16, Wildfire
Rene Kaprielian	September 14, 2024	<ul style="list-style-type: none"> <li>Concern about buildings being too high</li> <li>Concern about fire hazard and evacuation plan</li> <li>Concern about traffic congestion</li> <li>Suggestion for new location</li> <li>Request for detailed traffic study</li> <li>Question about parking</li> <li>Suggestion for new location</li> </ul>	Section 4.14, Transportation; Section 4.16, Wildfire; Chapter 6, Alternatives
Hugh Lyford	September 19, 2024	<ul style="list-style-type: none"> <li>Concern about traffic increase</li> <li>Concern about overflow of student parking</li> <li>Concern about aesthetic impact</li> </ul>	Section 4.1, Aesthetics; Section 4.14, Transportation
Marialuisa Kaprielian	September 19, 2024	<ul style="list-style-type: none"> <li>Suggestions for alternatives</li> <li>Request for transit evacuation proposal</li> </ul>	Section 4.14, Transportation; Chapter 6, Alternatives
Rod Clay	September 21, 2024	<ul style="list-style-type: none"> <li>Concern about fire, aesthetics, noise, loss of solar production, sewage, traffic, building height</li> </ul>	Section 4.1, Aesthetics; Section 4.11, Noise; Section 4.14, Transportation; Section 4.16, Wildfire
Nicole and William Snyder	September 24, 2024	<ul style="list-style-type: none"> <li>Concern about parking</li> <li>Concern about construction traffic and general student traffic</li> <li>Question about West Campus housing</li> <li>Concern about home values</li> <li>Concern about impacting microclimate</li> <li>Concern about reflective windows/glare</li> </ul>	Section 4.1, Aesthetics; Section 4.2, Air Quality; Section 4.7, Greenhouse Gas Emissions; Section 4.11, Noise; Section 4.12, Population and Housing;

## SDSU Evolve Student Housing CEQA Process

### Summary of Scoping Comments

Commenter	Date	Summary of Environmental Issues Raised	EIR Chapter/ Section Where Comment is Addressed
		<ul style="list-style-type: none"> <li>• Concern about noise impacts</li> <li>• Question about demolition air quality</li> <li>• Question about wildfire emergencies</li> <li>• Question about what students will live in the student housing building</li> <li>• Request for lower story buildings</li> </ul>	Section 4.14, Transportation; Section 4.16, Wildfire; Chapter 6, Alternatives
Karen Jorgensen (2)	September 25, 2024	<ul style="list-style-type: none"> <li>• Request for traffic study</li> <li>• Question about bedrooms/students</li> <li>• Concern about parking</li> <li>• Concern about general traffic and construction traffic</li> <li>• Request for a fire evacuation study</li> <li>• Alternative location suggestion</li> <li>• Concern about impacts to views</li> </ul>	Chapter 2, Project Description; Section 4.1, Aesthetics; Section 4.14, Transportation; Section 4.16, Wildfire
Eric Kelley	September 26, 2024	<ul style="list-style-type: none"> <li>• Request for interview</li> </ul>	N/A
Dominic Keiser	September 28, 2024	<ul style="list-style-type: none"> <li>• Request for Project renderings</li> </ul>	N/A
Susan Richardson	October 1, 2024	<ul style="list-style-type: none"> <li>• Concern about parking, and increase in greenhouse gas emissions</li> <li>• Concern about project timeline</li> <li>• Concern about public input and impacts to aesthetics, traffic, noise, and public services</li> <li>• Request to comply with all Multiple Species Conservation Program (MSCP) requirements</li> <li>• Concern about wildfire and evacuation</li> <li>• Concern about impacts to public services and parks</li> <li>• Concern about traffic impacts</li> </ul>	Section 4.14, Transportation; Section 4.7, Greenhouse Gas Emissions; Chapter 2, Project Description; Section 4.1, Aesthetics; Section 4.11, Noise; Section 4.13, Public Services and Recreation; Section 4.3, Biological Resources; Section 4.16, Wildfire
Amy Hernandez	October 2, 2024	<ul style="list-style-type: none"> <li>• Concern about traffic and parking</li> <li>• Request for a stronger police presence</li> </ul>	Section 4.14, Transportation; Section 4.13, Public Services and Recreation
Dino Richardson	October 3, 2024	<ul style="list-style-type: none"> <li>• Concern about impacts to public services</li> <li>• Concern about litter</li> <li>• Concern about parking</li> <li>• Question about campus boundaries and permits to build</li> </ul>	Section 4.13, Public Services and Recreation; Section 4.14, Transportation; Section

## SDSU Evolve Student Housing CEQA Process

### Summary of Scoping Comments

Commenter	Date	Summary of Environmental Issues Raised	EIR Chapter/ Section Where Comment is Addressed
			4.10, Land Use and Planning
James Fuentes	October 3, 2024	<ul style="list-style-type: none"> <li>• Concern about Project size and traffic impacts</li> <li>• Comment about SDSU territory</li> </ul>	Section 4.14, Transportation; Section 4.10, Land Use and Planning
<b>Organizations</b>			
KPBS, Andrew Bowen	August 27, 2024	<ul style="list-style-type: none"> <li>• Question regarding a CEQA exemption</li> </ul>	Chapter 2, Project Description
College Area Community Council (CACC), Julie Hamilton (1)	September 9, 2024	<ul style="list-style-type: none"> <li>• Request to extend the comment period for CACC to October 2, 2024</li> </ul>	N/A
Sierra Club San Diego Chapter	September 20, 2024	<ul style="list-style-type: none"> <li>• Suggestions to reduce air quality impacts</li> <li>• Request for measures to prevent impacts to biological resources in the surrounding MSCP area</li> <li>• Recommendations for Project energy measures</li> <li>• Request for a comprehensive greenhouse gas (GHG) inventory, mitigations for excess GHG, and for the Project to be free of natural gas</li> <li>• Hazards/hazardous materials suggestions for EIR analysis and Project demolition</li> <li>• Request for EIR to address runoff and erosion impacts</li> <li>• Request got the EIR to analyze the MSCP and surrounding land uses</li> <li>• Request for the EIR to provide noise analysis and mitigation measures</li> <li>• Project would be beneficial for traffic</li> <li>• Request for the Project to not use natural gas for utilities/service systems</li> <li>• Request for wildfire prevention measures</li> </ul>	Section 4.2, Air Quality; Section 4.3, Biological Resources; Section 4.5, Energy; Section 4.7, Greenhouse Gas Emissions; Section 4.8, Hazards and Hazardous Materials; Section 4.9, Hydrology and Water Quality; Section 4.10, Land Use and Planning; Section 4.11, Noise; Section 4.14, Transportation; Section 4.15, Utilities and Service Systems; Section 4.16, Wildfire
San Diego County Archaeological Society Inc.	September 25, 2024	<ul style="list-style-type: none"> <li>• Request to be included in notification of the public review of Draft EIR</li> </ul>	N/A



## SDSU Evolve Student Housing CEQA Process

### Summary of Scoping Comments

Commenter	Date	Summary of Environmental Issues Raised	EIR Chapter/ Section Where Comment is Addressed
CACC (2)	October 4, 2024	<ul style="list-style-type: none"> <li>• Concern about project timeline, CEQA comment period, and delay in mitigation</li> <li>• Concern about impacts to views</li> <li>• Concern about compliance with MSCP</li> <li>• Concern about soil stability and runoff</li> <li>• Concern about noise impacts</li> <li>• Concern about affordable housing and loss of housing</li> <li>• Concern about fire safety, evacuation, and public service impacts</li> <li>• Request for water and sewer capacity analysis</li> <li>• Request for recreation facility analysis</li> <li>• Concern about traffic and parking</li> </ul>	Section 4.1, Aesthetics; Section 4.3, Biological Resources; Section 4.10, Land Use and Planning; Section 4.6, Geology and Soils; Section 4.11, Noise; Section 4.12, Population and Housing; Section 4.17, Wildfire; Section 4.13, Public Services and Recreation; Section 4.16, Wildfire; Section 4.14, Transportation

**Note:**

N/A = not applicable to the EIR CEQA process

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**From:** 'Christina Brown cbrown4 at sdsu.edu' via Evolve Student Housing Project  
<evolvecomments@sdsu.edu>  
**Sent:** Monday, September 9, 2024 7:44 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Re: Share Your Input about the Evolve Housing Project

Hi Bob, Is there room on part of the plot for a regulation size field with lights that can be built with the initial scope and active until that piece of land is built out ? We can discuss when we meet Thursday.

Thanks,  
Christina

Christina Brown  
Executive Director  
Associated Students, San Diego State University

On Sep 9, 2024, at 4:01 PM, Robert Schulz, Associate Vice President of Real Estate, Planning & Development, and Kara Peterson, Director of Planning <evolvecomments@comms.sdsu.edu> wrote:

<<http://click.comms.sdsu.edu/open.aspx?ffcb10-fec6167271670d78-fe471079716c0375721d-fe2e117171640575741c75-ff2a15767263-fe621d707067017c7617-ff351d707565&d=110048&bmt=0>>

<<http://image.comms.sdsu.edu/lib/fe2e117171640575741c75/m/7/7733c889-d8b5-44b6-bed4-17ed1e4cb022.jpg>>  
Dear community members,

We extend our appreciation to those who were able to attend the two recent scoping meetings for the proposed Evolve Student Housing project, and who have provided input thus far. We also thank you for your questions and input. We are committed to keeping the community informed and engaged throughout the next phases of this process, and we encourage you to stay involved.

We are early in the project planning process for the multi-phased construction project, which, once completed, is designed to introduce up to seven residential buildings, approximately 5,200 new beds (4,500 net expansion), and one amenities building on campus. Additional information about the project design and logistics, potential impacts, and mitigation efforts will be provided in the Draft Environmental Impact Report to be completed and shared in January 2025.

You are encouraged to share comments you want to be considered as part of the project Scoping that will inform the Draft Environmental Impact Report by Wednesday, September 25, 2024 via the following:

- \* Email [evolvecomments@sdsu.edu](mailto:evolvecomments@sdsu.edu) <<mailto:evolvecomments@sdsu.edu?subject=>>> .
- \* Send comments by US Mail to Kara Peterson, Director of Planning, San Diego State University Planning, Design & Construction, 5500 Campanile Drive, San Diego, California 92182-1624.

If you would like to receive updates about the project, you can sign up via the online form  
<<http://click.comms.sdsu.edu/?qs=ff2b19938bae657a3467cf8a0c581bc3a9c2c3379536403abf16f546e8929f668d041a1e76de11d11f2556acf193087f704b26be646f53c7b6a4ffbf90411e8>> .

More information about the project is available on the Evolve Student Housing project page  
<<http://click.comms.sdsu.edu/?qs=ff2b19938bae657af809701b96b4cfc7e6097b705293e0a07a796d963122f3afadeb2dc056b0e872ea69c41b257ead5ce0e1726fe647dc79f07ac135bb990fb>> . The Notice of Preparation (NOP), Initial Study and Scoping Meeting Presentation are also available online  
<<http://click.comms.sdsu.edu/?qs=ff2b19938bae657a0d63bdf8f00adebd5e4c745be15b779c904712e6e5d5d4904a2c352e2710f694e0bc791cef477807c9b12ff36077f4cfaa80ffae7ae9ae42>> .

Once again, thank you for your time, interest, and ongoing commitment to making this project a success for our university, our students and surrounding community.

Bob Schulz  
Associate Vice President of Real Estate, Planning & Development  
SDSU Planning, Design and Construction

Kara Peterson  
Director of Planning  
SDSU Planning, Design and Construction  
San Diego State University  
Digital Privacy Statement  
<<http://click.comms.sdsu.edu/?qs=ff2b19938bae657a995db2e85683d03ba6f231467f29685ddb46ce6c5764ef39c25adf5ed6b025c86409e3b1ac757713f1a3775640952846fe22959a0a6e29d9>>  
View as web page  
<<http://view.comms.sdsu.edu/?qs=0cbc1bc0f9bd9e376335ad74216cd38e2f817b3991ffaeef6c73fc1151357838135e2eb338cd386224769dd5d9102cdb482fdb6f695507972165db321bee3a7969ba21a519328424f8860fc64da39e3>>

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[evolvecomments+unsubscribe@sdsu.edu](mailto:evolvecomments+unsubscribe@sdsu.edu) <<mailto:evolvecomments+unsubscribe@sdsu.edu>> .

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**From:** 'Debra Brown' via Evolve Student Housing Project <evolvecomments@sdsu.edu>  
**Sent:** Wednesday, August 28, 2024 9:50 AM  
**To:** evolvecomments@sdsu.edu  
**Subject:** NOP response consistent with CEQA guidelines section 15082

I have read through the certified letter I received on August 27th regarding the Peninsula Component and the University Towers East Component projects. I understand the removal of old structures and replacing them with new larger facilities would increase BED CAPACITY but I did not read anything that addressed PARKING.

In the environmental impact categories I did not see **parking as an impact**. The community is already saturated with cars (even with the B sticker restriction).

**Question #1** Where will the additional cars (that go hand and hand with the additional students who will be sleeping in these additional beds) be parking? Every student seems to arrive with vehicle, so is it safe to assume that each new structure will also have ample parking for the building capacity?

New structures have opened on Montezuma Rd and College Ave. From the outside, (at night when you can see lights in rooms,etc) they do not seem to be fully occupied.

**Question #2** Are **all** the current student housing facilities at or near the campus at capacity? Will they be more affordable to encourage students to rent on campus and not surrounding houses in the community?

The land purchased by Snapdragon Stadium was advertised as SDSU West/ research/classroom buildings, stadium AND DORMITORIES.

**Question #3** When will dorms be built in this area? What phase is that coming in? OR was this false advertisement to get the land and just the stadium, stadium parking and a soccer field are all we are going to get?

Respectfully,

Debra Maxie

College Area Resident/Homeowner (on Campanile Drive 30+years)

browndebra20@yahoo.com

To unsubscribe from this group and stop receiving emails from it, send an email to [evolvecomments+unsubscribe@sdsu.edu](mailto:evolvecomments+unsubscribe@sdsu.edu).



October 4, 2024

Kara Peterson  
Director of Planning, Design and Construction  
SDSU  
5500 Campanile Drive,  
San Diego, CA 92182-1624  
[evolvecomments@sdsu.edu](mailto:evolvecomments@sdsu.edu)

VIA EMAIL

**RE: NOTICE OF PREPARATION OF DRAFT ENVIRONMENTAL IMPACT REPORT, EVOLVE STUDENT HOUSING PROJECT**

Dear Ms. Peterson:

The College Area Community Council (“CACC”) would like to submit this comment letter in response to the above Notice of Preparation (“NOP”). The CACC is devoted to preserving and improving the College Area’s physical qualities. Although the CACC will not take a position on this project at this point in time; the broad description provided in the NOP and the Initial Study does raise concerns with the community.

The project phasing is ambitious but entirely unrealistic. Allowing just eight months for the California Environmental Quality Act (“CEQA”) process allows little time to respond to comments on the draft environmental impact report (“DEIR”) and no time to revise the document if necessary. Additionally, assuming the EIR will be certified, and construction will start in May 2025 leaves little time for mitigation of impacts if necessary. SDSU cannot assume there will be no impacts to mitigate after the EIR is certified and before construction begins. SDSU does not have a solid history on mitigation. The City sued SDSU to require mitigation for the Alvarado Canyon project and the mitigation for South Campus Plaza was completed six years after the project was completed. CACC seeks to avoid these delays in mitigation for this project. Particularly given the potential for significant impacts caused by the project.

The project will have a significant impact on views from Interstate 8, Del Cerro and College View Estates. SDSU should consider avoiding or mitigating these impacts to less than significant.

The Initial Study states the project is not subject to MSCP because the project is on state land. CACC believes this land is not part of the grant to SDSU but was purchased by SDSU; therefore, SDSU must follow MSCP when considering the environmental impacts of the

4704 College Avenue, San Diego CA 92115  
<https://www.collegearea.org>

project. The project may have significant impacts on the environmentally sensitive habitat located immediately adjacent to the project site. These impacts must be avoided or mitigated prior to disturbance of this sensitive habitat.

Members of the CACC Board of Directors have expressed concern with the stability of soils in the area, particularly considering increased runoff associated with global warming. The CACC requests the DEIR include a thorough discussion of geology and soils that fully considers the impacts of increased development on the canyon rim and changing conditions due to climate change.

CACC is concerned with significant noise impacts from long-term construction in this area. SDSU should thoroughly investigate all potential noise impacts during construction and take all necessary steps to avoid and minimize noise. At no time should SDSU use mechanized equipment outside of the construction times allowed in the San Diego Municipal Code. The project site is adjacent to single family residences and across an urban canyon from single family residences. Impacts on the residents of this area should be minimized to the maximum extent feasible. All mechanical equipment should be screened and located in a manner to minimize impacts on the neighboring residential communities.

Many of the apartments to be demolished on 55<sup>th</sup> Street are currently affordable. How will SDSU replace the existing naturally occurring affordable housing on 55<sup>th</sup> Street? The NOP states the project will result in the loss of 702 existing student beds while the Population and Housing section of the Initial Study states the project will result in the loss of 76 existing student beds. Please resolve this inconsistent information.

SDSU is proposing to construct 4,500 new student beds with no parking and little vehicular access in a Very High Fire Hazard Severity Zone. The community plan requires the construction of a fire station on 55<sup>th</sup> Street, but this fire station has not been built. How does SDSU intend to address fire safety concerns? As it stands, there are only two points of evacuation for College View Estates and Alvarado Estates; adding 4500 student beds evacuating along the same routes creates a significant fire safety concern. Attorney General Rob Bonta has opined that adding density in a Very High Fire Hazard Severity Zone is a significant impact. SDSU must carefully examine this issue to avoid or minimize public service impacts to fire protection.

The DEIR must include a thorough analysis of existing water and sewer capacity to determine the impact of adding 5,200 student beds in this location. This is an issue that is continually ignored but must be considered when analyzing the impact on public services.

SDSU's assumption that the existing recreation facilities are adequate to accommodate an increase in 4,518 new residents on campus must be supported with substantial evidence. Please provide a comparison of other college campuses with similar student populations and the amount of recreation space on campus. The College Area has less than 10% of the park space and amenities called for in the Parks Master Plan. SDSU must avoid any additional impacts on community parks and recreation by providing adequate recreation space on campus.

It is unrealistic for SDSU to believe none of the residents of Evolve will need a vehicle. The unique aspects of San Diego that make it desirable to out of town students is the night life

and beaches. Transit to areas that are more active in the evenings and to the beaches is limited. In addition, there are few employment opportunities for students in the College Area - students often have to travel for work. SDSU must fully consider the increase in vehicles traveling to and from the campus with 5,200 new student beds and the loss of parking from the project. In addition, SDSU must consider the impact to traffic in the area with the increase of 4,518 new pedestrians in the area.

Thank you for extending the deadline to comment in the NOP, we appreciate the consideration. Please feel free to contact me for additional information or if you have any questions.

Regards,



Julie M. Hamilton  
President  
College Area Community Council

## California Department of Transportation

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
(619) 985-1587 | FAX (619) 688-4299 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



September 18, 2024

11-SD-8  
PM R23.3  
Evolve Student Housing Project  
NOP/SCH# 2024080979

Ms. Kara Peterson  
Director of Planning  
San Diego State University  
Director of Planning  
5500 Campanile Drive  
San Diego, CA 92182

Dear Ms. Peterson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process of the Notice of Preparation (NOP) of the Evolve Student Housing Project on the campus of San Diego State University (SDSU) located near Interstate 8 (I-8) and College Avenue in San Diego. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.



We look forward to working with SDSU in areas where the University and Caltrans have joint jurisdiction to improve the transportation network and connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

### **Traffic Engineering and Analysis**

The Draft Environmental Impact Report needs to include a safety review that follows the Caltrans "Local Development Review (LDR) Safety Review Practitioner's Guidance" <https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/202402-ldr-safety-review-practitioners-guidance-a11y.pdf>.

A Vehicle Miles of Travel (VMT) based Traffic Impact Study (TIS) should be provided for this project. Please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts.<sup>1</sup>

The TIS may also need to identify the proposed project's near-term and long-term safety or operational issues, on or adjacent any existing or proposed State facilities.

### **Hydraulics**

1. Please provide Evolve Student Housing Project Improvement Plans and include:

- Grading Plans with 1-foot contours.
- Drainage Infrastructure Plans (existing and proposed).
- Complete Hydrology and Hydraulics Report.
- Show Caltrans' Right-of-Way (R/W) and I-8 centerline.

2. Provide any development and/or improvement within Caltrans' R/W and include:

- Existing and Proposed Grading Plans with 1-foot contour intervals.
- Existing and Proposed Drainage Features.
- Caltrans' R/W and I-8 centerline.
- Existing and Proposed Roadway Features.
- I-8 onsite Hydrology and Hydraulics Studies in accordance with Caltrans Highway Design Manual (HDM) for the existing and proposed conditions.
- I-8 offsite existing and proposed Hydrology and Hydraulics Studies, if necessary.

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<sup>1</sup> California Governor's Office of Planning and Research (OPR) 2018. "Technical Advisory on Evaluating Transportation Impacts in CEQA." [https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)

Early coordination with Caltrans is recommended.

Caltrans generally does not allow development projects to impact hydraulics within the State's Right-of-Way. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.

## Noise

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of I-8.

## System Planning

System Planning recommends incorporating further discussion of the planned potential transportation-related projects found in the [Kumeyaay Corridor CMCP](#).

- Appendix E: Transportation Solutions, Cost Estimates, and Phasing Results
  - ID: AT3, Strategy Name: 63<sup>rd</sup> Street Class II, Description: From Montezuma Road to El Cajon Boulevard.
  - ID: AT18, Strategy Name: Baja Drive Class III, Description: From 54<sup>th</sup> Street to Eastern terminus.
  - ID: AT36, Strategy Name: Campanile Drive Class III, Description: From Hardy Avenue to Baja Drive.
  - ID: AT54, Strategy Name: College Avenue Class I (north), Description: From Del Cerro Boulevard to El Cajon Boulevard.
  - ID: AT180, Strategy Name: Montezuma Drive Class IV, Description: From Fairmount Avenue to El Cajon Boulevard.
  - ID: AT181, Strategy Name: Montezuma Road Class I (east), Description: From 54<sup>th</sup> Street to 55<sup>th</sup> Street.
  - ID: R26.5, Strategy Name: College Avenue Interchange, Description: The concept includes widening of College Avenue across I-8 to reduce conflicts, weaving, provide for Class IV cycle tracks, and enhanced pedestrian environment.
  - ID: R38, Strategy Name: El Cajon Boulevard- College Avenue to Montezuma Road, Description: Repurpose El Cajon Boulevard to provide Class IVs, wider sidewalks, bus pull-out.
  - ID: R39, Strategy Name: Montezuma Road - College Avenue to El Cajon Boulevard, Description: Repurpose Montezuma Road to provide for Class IVs and linear park.
  - ID: R54, Strategy Name: College Avenue - Transit Improvement, Description: Convert 2 general purpose lane to flex lanes and provide Class II buffer bike

lanes. Including a short segment along Montezuma Road and Campanile Drive to provide connectivity to the SDSU Transit Center.

- ID T3, Strategy Name: LRT 530, Description: Green Line Double/Third Track and Grade Separations.
- ID: T13, Strategy Name: Rapid 215, Description: Rapid 215- SDSU- Downtown via El Cajon Boulevard.
- ID: T14, Strategy Name: Rapid 625, Description: SDSU to Palomar Station via East San Diego, Southeast San Diego, National City.
- ID: T15, Strategy Name: Rapid 11, Description Rapid overlay on Route 11.
- ID: T19, Strategy Name: Lemon Grove Rapid 856, Description: Convert Route 856 to Rapid.
- ID: FF6, Strategy Name: Flexible Fleets, Description: Flexible Fleet Enhanced Area in SDSU – micromobility.
- ID: FF7, Strategy Name: Flexible Fleets, Description: Flexible Fleet Enhanced Area in SDSU – NEV.
- ID: FF8, Strategy Name: Flexible Fleets, Description: Flexible Fleet Enhanced Area in SDSU – Carshare.
- ID: MH4, Strategy Name: Mobility Hub-SDSU, Description: Parking Corrals for rideables, multilingual Interactive Kiosks, EV and e-bike chargers, Dynamic curb management, landscaping and shade, placemaking, personal delivery lockers, bike parking and fix-it stations.
- ID NO21, Strategy Name: Next OS - flex lanes Intersections - College Avenue, Description: Install flex lanes intersection technology to give priority to transit, freight and emergency vehicles and reduce intersection conflicts between vehicles, pedestrians, and cyclists, improving safety for vulnerable road users.
- ID: NO22, Strategy Name: Next OS - flex lanes Intersections - Montezuma Road, Description: Install flex lanes intersection technology to give priority to transit, freight and emergency vehicles and reduce intersection conflicts between vehicles, pedestrians, and cyclists, improving safety for vulnerable road users.
- ID: NO54, Strategy Name: Flex lanes Parking – SDSU, Description: Implement flex lanes parking functionality which provides enhanced information on parking availability, time limitations, costs, and payment in conjunction with curb management. Support ATDM functionality.
- ID: NO40, Strategy Name: Next OS - Flex Lane - Montezuma Road, Description: Flex lanes to be dynamically reserved for transit, shuttles, rideshare, carshare, HOV, and/or electric vehicles to relieve congestion and improve travel times.
- ID: NO39, Strategy Name: Next OS - Flex Lane - College Avenue, Description: Flex lanes to be dynamically reserved for transit, shuttles, rideshare, carshare, HOV, and/or electric vehicles to relieve congestion and improve travel times.
- ID: Other5, Strategy Name: Add Fiber Optics, CCTV and Detector Stations (Loops) to replace regular supply line from Fairmount Road to West Main Street, Description: This improvement is planned for the 2013 10 Year SHOPP List.

The 2021 Regional Transportation Plan relates to various aspects of the Evolve Student Housing Project-SDSU and aligns with various topics covered in the Plan.

- Appendix A: Transportation Projects, Programs, and Phasing:  
(<https://www.sandag.org/-/media/SANDAG/Documents/PDF/regional-plan/2021-regional-plan/final-2021-regional-plan/2021-regional-plan-appendix-a-2021-12-01.pdf> )
  - South Bay to Sorrento (Page A-14)
    - Project ID:TL 43, Year Built: 2035, Category: Transit Leap, Project Name: Rapid 625, Description: SDSU to Palomar Station via East San Diego, Southeast San Diego, National City.
  - Interstate 8 (Pages A39-A40)
    - ID: TL17, Category: Transit Leap, Project Name: LRT 530, Description: Green Line (Santee to Downtown, double/third tracking and grade separations).
    - ID: CC024, Category: Complete Corridor: ML/Goods Movement, Description: I-8 (I-805 to College Avenue).
  - Transit leap Frequency and Span of Service (Page A1-1).
    - Commuter Rail- Route 581 (Downtown to El Cajon via SDSU and La Mesa).
    - Commuter Rail- Route 581B (Central Mobility Hub to El Cajon via SDSU and La Mesa).
    - Rapid- Route 215 (SDSU- Downtown via El Cajon Boulevard).
    - Rapid- Route 295 (Spring Valley to Clairemont via La Mesa and Kearny Mesa).
    - Local Bus- Route 11 (SDSU- Downtown San Diego).
    - Local Bus- Route 115 (El Cajon Transit Center- SDSU Transit Center).
    - Local Bus- Route 856 (SDSU- Cuyamaca College).
    - Local Bus- Route 936 (Spring Valley- SDSU).
    - Local Bus- Route 955 (National City- SDSU).
- Appendix K: Regional Housing Needs Assessment Plan states  
(<https://www.sandag.org/-/media/SANDAG/Documents/PDF/regional-plan/2021-regional-plan/final-2021-regional-plan/2021-regional-plan-appendix-k-2021-05-01.pdf>)

“The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction. The major universities and community colleges in the San Diego region are located in urban areas served by the existing transportation network. The City of San Diego is home to San Diego State University...” (Page 36). The Evolve Student Housing Project-SDSU supports this statement by planning more student housing near existing transit and transit links.

The College Area Community Plan was adopted in 1989. A [new College Area Community Plan](#) is in draft form, with an expected final release date in late 2024.

The following planning documents frequently utilized by Caltrans System Planning should be reviewed and incorporated in the development of the Evolve Student Housing Project-SDSU. These documents may provide further background on state planning.

[California Transportation Plan 2050](#)

Encourage Efficient Land Use (Page 124).

[Climate Action Plan for Transportation Infrastructure](#)

- Executive Order N-19-19 (Page 6).
- Guiding Principle: Promoting compact infill development while protecting residents and businesses from displacement by funding transportation projects that support housing for low-income residents near job centers, provide walkable communities, and address affordability to reduce the housing-transportation cost burden and auto trips (Page 17).
- S7. Strengthen Transportation-Land Use Connections (Page 32).

Upcoming Regional Projects

- Purple Line project has potential alignments through the SDSU Mission Valley campus that could support the transportation connectivity for the future increase in student housing population.

**Environmental**

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. Please indicate our status as a Responsible Agency for the Final Environmental Document. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the Environmental Document that Caltrans will use for our subsequent environmental compliance.

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project that include the work in Caltrans' R/W, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The

supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

### **Right-of-Way**

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Additional information regarding encroachment permits may be obtained by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Projects with the following:

- require a Caltrans Encroachment Permit.
- have completed the Caltrans Local Development Review (LDR) process.
- have an approved environmental document.

are to submit documents for Quality Management Assessment Process (QMAP) process via email to [D11.QMAP.Permits@dot.ca.gov](mailto:D11.QMAP.Permits@dot.ca.gov). Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Mark McCumsey, LDR Coordinator, at (619) 985-4957 or by e-mail sent to [mark.mccumsey@dot.ca.gov](mailto:mark.mccumsey@dot.ca.gov).

Sincerely,

*Kimberly D. Dodson*

KIMBERLY D. DODSON, GISP  
Branch Chief  
Local Development Review



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
[wildlife.ca.gov](http://wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



September 23, 2024

The Board of Trustees of the California State University  
Kara Peterson  
San Diego State University  
5500 Campanile Drive  
San Diego, CA 92182-1624  
[kara.peterson@sdsu.edu](mailto:kara.peterson@sdsu.edu)

**SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE EVOLVE STUDENT HOUSING PROJECT, SCH NO. 2024080979, SAN DIEGO COUNTY, CA**

Dear Kara Peterson:

The California Department of Fish and Wildlife (CDFW) reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from The Board of Trustees of California State University (CSU; Lead Agency) for the Evolve Student Housing Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines<sup>1</sup>.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife.

**CDFW ROLE**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW also oversees implementation of the Natural Community Conservation Planning (NCCP) program, a comprehensive habitat conservation planning program. The City of San Diego participates in the NCCP program by implementing its approved Multiple

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.



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Species Conservation Program (MSCP) Subarea Plan (SAP) and Implementing Agreement. The City's Multi-Habitat Planning Area (MHPA) delineates core biological resource areas and corridors targeted for conservation under the SAP. Although CSU is not a signatory to the MSCP, and therefore not a Permittee, the northern portion of the Project site is immediately adjacent to MHPA.

## PROJECT DESCRIPTION SUMMARY

**Proponent:** San Diego State University (SDSU)

**Objective:** The objective of the Project is to develop two new SDSU housing complexes. The proposed developments are in two separate locations, referenced as the Peninsula Component and the University Towers East Component. Both sites would require demolition of existing structures and construction of new housing, amenity, and parking facilities.

**Location:** The SDSU campus is in eastern San Diego, along Interstate 8, approximately eight miles from downtown San Diego. The Peninsula Component will be located on a 10.3-acre site at the terminus of 55<sup>th</sup> Street, adjacent to the northwest portion of the campus, south of Interstate 8. The University Towers East Component will be located on a 0.71-acre site on Montezuma Road, currently utilized as a parking lot for an existing student residence building.

**Biological Setting:** The University Towers East Component site and adjacent areas are fully developed. The Peninsula Component is currently developed with student housing, but the undeveloped adjacent habitat areas are known to support coastal California gnatcatcher (*Polioptila californica californica*; federal Endangered Species Act threatened, State Species of Special Concern).

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist CSU in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

### Specific Comments

- 1) **MHPA Adjacency.** The Initial Study (San Diego State University, 2024) indicates that, "SDSU is not a signatory or participant in the City's MSCP Subarea Plan; it is therefore not subject to the requirements of this planning tool, but a portion of City's Multi-Habitat Plan Area has been designated over the Peninsula Project component. Although SDSU is not subject to the MSCP Subarea Plan, the requirements of the plan, nor MHPA guidelines, the EIR will outline the proposed Project's consistency with the plan for informational purposes" (San Diego State University, 2024). The Peninsula Component Project site is directly adjacent to open space that is designated as 75%-100% conserved MHPA. Given that the



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Project site is directly adjacent to the City of San Diego's Multi-Habitat Planning Area (MHPA), CDFW recommends that the DEIR evaluate the Project's indirect impacts to the MHPA and address consistency with the City's Land Use Adjacency Guidelines (LUAG) provided in Section 1.4.3 of the City's Subarea Plan (SAP). Indirect impacts to be addressed include, but are not limited to: drainage, toxins, lighting, noise, barriers, invasive species, brush management, and grading/land development.

- 2) **Coastal California Gnatcatcher.** The coastal California gnatcatcher is a small songbird that relies on coastal sage scrub and other related coastal shrub communities for habitat. The undeveloped areas surrounding the Peninsula Component site likely contain suitable gnatcatcher habitat, which could be impacted by the proposed development. The DEIR should include focused surveys conducted in accordance with protocols set forth by the US Fish and Wildlife Service (USFWS). The analysis within the DEIR should thoroughly evaluate the potential direct impacts to gnatcatcher and their habitat from activities such as vegetation clearing and grading, as well as indirect impacts from increased human activity, noise, lighting, and other edge effects. CDFW recommends that the DEIR identify appropriate avoidance, minimization, and mitigation measures developed in accordance with CDFW and USFWS.

## General Comments

- 1) Disclosure. The DEIR should provide an adequate, complete, and detailed disclosure about the effects which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Such disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
- 2) Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information be included in the DEIR.
  - a. A complete discussion of the purpose and need for, and description of the proposed Project.
  - b. A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife movement areas. CDFW recommends CSU select Project designs and alternatives that would avoid or otherwise minimize direct and indirect impacts on biological resources. CDFW also recommends CSU consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future Project-related construction, activities, maintenance,

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and development. As a general rule, CDFW recommends reducing or clustering a development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

- c. Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The DEIR shall include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).
  - d. Where the Project may impact aquatic and riparian resources, CDFW recommends CSU select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also recommends an alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and natural communities. Project designs should consider elevated crossings to avoid channelizing or narrowing of watercourses. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level, which may cause the watercourse to alter its course of flow.
- 3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. An impact analysis will aid in determining the Project's potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to Species of Special Concern (SSC) a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The DEIR should include the following information.
- a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines, § 15125(c)). The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks

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can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities webpage](#)<sup>2</sup>.

- b. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#)<sup>3</sup>. Botanical field surveys should be comprehensive over the entire Project site, including areas that will be directly or indirectly impacted by the Project. Adjoining properties should also be surveyed where direct or indirect Project effects could occur, such as those from fuel modification, herbicide application, invasive species, and altered hydrology. Botanical field surveys should be conducted in the field at the times of year when plants will be both evident and identifiable. Usually, this is during flowering or fruiting. Botanical field survey visits should be spaced throughout the growing season to accurately determine what plants exist in the Project site. This usually involves multiple visits to the Project site (e.g., in early, mid, and late season) to capture the floristic diversity at a level necessary to determine if special status plants are present.
- c. Floristic alliance- and/or association-based mapping and vegetation impact assessments conducted in the Project site and within adjacent areas. The [Manual of California Vegetation](#)<sup>4</sup>, second edition, (Sawyer, Keeler-Wolf, & Evens, 2009) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where the Project's construction and activities could lead to direct or indirect impacts offsite.
- d. A complete and recent assessment of the biological resources associated with each habitat type in the Project site and within adjacent areas. A full literature review includes but is not limited to CDFW's [California Natural Diversity Database](#)<sup>5</sup> (CNDDDB). The CNDDDB should be accessed to obtain current information on any previously reported sensitive species and habitat. An assessment should include a minimum nine-quadrangle search of the CNDDDB to determine a list of species potentially present in the Project site. A nine-quadrangle search should be provided in the Project's CEQA document for adequate disclosure of the Project's potential impact on biological resources.
- e. A complete, recent, assessment of endangered, rare, or threatened species and other sensitive species within the Project site and adjacent areas, including SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, §

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<sup>2</sup> <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>

<sup>3</sup> <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>

<sup>4</sup> <https://vegetation.cnps.org/>

<sup>5</sup> <https://wildlife.ca.gov/Data/CNDDDB>

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15380). Seasonal variations in use of the Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See [CDFW's Survey and Monitoring Protocols and Guidelines](#)<sup>6</sup> for established survey protocol. Acceptable species-specific survey procedures may be developed in consultation with CDFW and U.S. Fish and Wildlife Service.

- f. A recent wildlife and rare plant survey. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review (CEQA Guidelines, § 15003(i)). CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if Project implementation build out could occur over a protracted time frame or in phases.
- 4) Direct and Indirect Impacts on Biological Resources. The DEIR should provide a thorough discussion of direct and indirect impacts expected to affect biological resources with specific measures to offset such impacts. The DEIR should address the following.
- a. A discussion of potential impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures. A discussion regarding Project-related indirect impacts on biological resources. These include resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)).
  - b. A discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted (CEQA Guidelines, § 15126.2(a)).
  - c. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the DEIR.
  - d. A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion

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<sup>6</sup> <https://wildlife.ca.gov/conservation/survey-protocols>

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should also address the potential water extraction activities and the potential resulting impacts on habitat supported by the groundwater. Measures to mitigate such impacts should be included.

- e. An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR.

- 5) Cumulative Impact. Cumulative impacts on biological resources can result from collectively significant projects which are individually insignificant. The Project, when considered collectively with prior, concurrent, and probable future projects, may have a significant cumulative effect on biological resources. The Project may have the potential to substantially reduce the number or restrict the range of endangered, rare, or threatened species. Species that may be impacted by the Project include, but are not limited to, the biological resources described in this letter.

Accordingly, CDFW recommends the DEIR evaluate the Project's potential cumulative impacts on biological resources. The Project may have a "significant effect on the environment" if the possible effects of the Project are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (Pub. Resources Code, § 21083(b)). CSU's conclusions regarding the significance of the Project's cumulative impact should be justified and supported by evidence to make those conclusions. Specifically, if CSU concludes that the Project would not result in cumulative impacts on biological resources, CSU, "shall identify facts and analysis supporting the Lead Agency's conclusion that the cumulative impact is less than significant" (CEQA Guidelines section § 15130(a)(2)).

- 6) Nesting Birds. To avoid impacts to nesting birds, CDFW recommends that clearing of vegetation occur outside of the peak avian breeding season, which generally runs from February 1 through September 1 (as early as January 1 for some raptors). If Project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting breeding bird surveys should conduct a nesting bird survey within three days prior to work in the area. If an active nest is identified, a buffer should be established between the construction activities and the nest so that nesting activities are not interrupted. CDFW generally recommends a 100-foot buffer from common avian species, 300 feet for listed or highly sensitive, and 500 feet for raptors. However, larger buffer distances may be necessary based on Project-specific activities and the species. The buffer should be delineated by temporary fencing and remain in effect as long as construction is occurring. No Project construction should occur within the fenced nest zone until the young have

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fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the Project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

- 7) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project through the use of feasible alternatives or mitigation measures (CEQA Guidelines, §§ 15002(a)(3), 15021). Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate impacts below a significant level under CEQA. Mitigation measures must be feasible, effective, implementable, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4).
  - a. The DEIR should provide mitigation measures that are specific and detailed (i.e., responsible party, timing, specific actions, location) in order for a mitigation measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).
  - b. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the DEIR should include a discussion of the effects of proposed mitigation measures (CEQA Guidelines, § 15126.4(a)(1)). In that regard, the DEIR should provide an adequate, complete, and detailed disclosure about the Project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
- 8) Compensatory Mitigation. The DEIR should include compensatory mitigation measures for the Project's significant impacts (direct and/or through habitat modification) to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and minimization of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore inadequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and financial assurance and dedicated to a qualified entity for long-term management and monitoring.
- 9) Long-term Management of Mitigation Lands. For proposed mitigation lands, the DEIR should include measures to protect the targeted habitat values in perpetuity. The mitigation should offset Project-induced qualitative and quantitative losses of biological resources. Issues that should be addressed include (but are not limited



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to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate endowment should be set aside to provide for long-term management of mitigation lands.

- 10) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant. Take of any endangered, threatened, candidate species, or NPPA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish & G. Code, §§ 2080.1, 2081, subs. (b) and (c)). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit.

To ensure CDFW will be able to use CSU's CEQA document for the issuance of an ITP, the DEIR should address all Project impacts to CESA-listed species and specify a mitigation, monitoring, and reporting program that will meet the requirements of an ITP.

- 11) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals. These efforts are experimental, and the outcome is unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.
- 12) Scientific Collecting Permit. A Scientific Collecting Permit would be necessary if there is a plan to capture and relocate wildlife. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). A Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with

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otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). For more information, please see CDFW's [Scientific Collecting Permit webpage](#)<sup>7</sup>.

- 13) Lake and Streambed Alteration. CDFW has regulatory authority over activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW recommends that CSU assess whether notification is appropriate. A Notification package for a LSAA may be obtained by accessing CDFW's [Lake and Streambed Alteration Program website](#)<sup>8</sup>.
- 14) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the [Fish and Game Commission's \(Commission\) policies](#)<sup>9</sup>. Through its Wetlands Resources policy, the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement, and expansion of wetland habitat in California" (California Fish and Game Commission, 2005). It is the policy of the Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."
  - a. The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project should include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and

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<sup>7</sup> <https://wildlife.ca.gov/Licensing/Scientific-Collecting>

<sup>8</sup> <http://www.wildlife.ca.gov/Conservation/LSA>

<sup>9</sup> <https://fgc.ca.gov/About/Policies/Miscellaneous>

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watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the DEIR and these measures should compensate for the loss of function and value.

- b. The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).
- 15) Use of Native Plants and Trees. CDFW recommends CSU require the Project Applicant to provide a native plant palette for the Project. The Project's landscaping plan should be disclosed and evaluated in the DEIR for potential impacts on biological resources such as natural communities adjacent to the Project site (e.g., introducing non-native, invasive species). CDFW supports the use of native plants for the Project especially considering the Project's location adjacent to protected open space and natural areas. CDFW strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Moderate' or 'High' by the [California Invasive Plant Council](#)<sup>10</sup> CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting species of trees, such as oaks (*Quercus* genus), and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.

## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural

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<sup>10</sup> <https://www.cal-ipc.org/plants/inventory/>

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communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The [CNDDDB website](#)<sup>11</sup> provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)<sup>12</sup>.

CSU should ensure data collected for the preparation of the DEIR is properly submitted.

## FILING FEES


The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

## CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist CSU in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jessie Lane, Environmental Scientist, at (858) 354-4105 or [Jessie.Lane@wildlife.ca.gov](mailto:Jessie.Lane@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
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Victoria Tang  
Environmental Program Manager  
South Coast Region

ec: [California Department of Fish and Wildlife](#)  
Victoria Tang, Environmental Program Manager  
Jennifer Turner, Senior Environmental Scientist (Supervisory)  
Melanie Burlaza, Senior Environmental Scientist (Supervisory)  
Jessie Lane, Environmental Scientist  
Alison Kalinowski, Environmental Scientist

<sup>11</sup> <https://wildlife.ca.gov/Data/CNDDDB>

<sup>12</sup> <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

Kara Peterson  
The Board of Trustees of California State University  
September 23, 2024  
Page 13 of 13

US Fish and Wildlife Service

David Zoutendyk, Division Supervisor, [David\\_Zoutendyk@fws.gov](mailto:David_Zoutendyk@fws.gov)  
Anita Eng, Fish and Wildlife Biologist, [Anita\\_Eng@fws.gov](mailto:Anita_Eng@fws.gov)

Office of Planning and Research  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

## REFERENCES

- California Department of Fish and Game. (2011). *CNDDDB Data Use Guidelines*. Retrieved from <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=27285&inline>
- California Department of Fish and Wildlife. (2021). *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>.
- California Fish and Game Commission. (2005). *Miscellaneous Policies*. Retrieved from <https://fgc.ca.gov/About/Policies/Miscellaneous>
- Sawyer, J. O., Keeler-Wolf, T., & Evens, J. M. (2009). *A Manual of California Vegetation* (Second ed.). Sacramento, CA: California Native Plant Society. Retrieved from <https://vegetation.cnps.org/>

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**From:** evolvecomments@sdsu.edu on behalf of Raphael, Rita  
<Rita.Raphael@sdcounty.ca.gov>  
**Sent:** Tuesday, September 10, 2024 12:11 PM  
**To:** evolvecomments@sdsu.edu  
**Cc:** Robertson, Kelly; Gurfield, Arleen; Preece, Sharon; Moreno, Zoraida; Khalili, Atieh  
**Subject:** IJN Review: SDSU Evolve Student Housing Project

Hi,

Kindly find below the comments for the project above:

HMD Comments are as follows:

1. **PLAN CHECK:** Due to the building and construction this project proposes, you will be required to submit a Hazardous Materials Questionnaire to the Hazardous Materials Division (HMD) and complete a HMD Hazardous Materials Plan Check review prior to issuance of a certificate of occupancy by the Building Department. Additional information on Plan Check requirements can be found on our website at: Hazardous Materials Plan Check (sandiegocounty.gov) <[https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat/hmd\\_plan\\_check.html](https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat/hmd_plan_check.html)>
2. **HAZARDOUS MATERIALS:** If chemicals/hazardous materials/hazardous wastes stored in project will hold a volume greater than or equal to 55 gallons, 500 pounds or 200 cubic feet each (e.g. gasoline, diesel fuel, lubricating oil, grease, cleaning products, landscaping chemicals and fertilizers, and solvents, etc.), the inventory must be added to the existing permit for San Diego State University (SDSU) (RECORD NUMBER: DEH2002-HUPFP-115140 ; CERS ID: 10127458). Updates to the existing Hazardous Materials Business Plan (HMBP) will be required within 30-days of the hazardous materials and/or hazardous wastes related to this project is on site. Please be advised, any proposed activities involving the storage and handling of hazardous materials will require the owner/operator and/or contractor(s) to comply with local and state laws and regulations. Additional information on HMBP requirements can be found on our website at: HMBP (sandiegocounty.gov) <<https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat.html>>
3. **HAZARDOUS WASTE:** All construction-related hazardous wastes (e.g. waste gasoline, waste diesel fuel, waste lubricating oil/grease, waste cleaning products, waste landscaping chemicals and fertilizers, and waste solvents, etc.) generated and stored onsite must be properly labeled and handled in manner to prevent release to the environment. In addition, SDSU and/or contractor(s) must ensure any hazardous wastes generated onsite during construction is properly disposed by registered hazardous waste transporter and compliant with local and state laws and regulations. Additional information on Hazardous Waste requirements can be found on our website at: Hazardous Waste (sandiegocounty.gov) <<https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazwaste.html>>
4. **ABOVEGROUND PETROLEUM STORAGE:** HMD records indicate SDSU is currently storing 7,561 gallons of petroleum in aboveground tanks and containers and is subject to additionally regulatory requirements under the California Aboveground Petroleum Storage Act (APSA). Be advised, amendments may be required to your existing Spill



Prevention, Control, and Countermeasure (SPCC) plan if you plan on storing any petroleum products related to this project in 55-gallons or greater containers or tanks. IMPORTANT: Facilities storing an aggregate of 10,000 or more gallons of petroleum must have their SPCC plan certified by a professional engineer. Additional information on APSA can be found on our website at: APSA ([sandiegocounty.gov](http://sandiegocounty.gov))  
<[https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd\\_apsa.html](https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_apsa.html)>

5. CONTAMINATED SOIL: If it is discovered that any hazardous materials and or waste has been released to the environment before or during the project, the contaminated environmental media (e.g. soil) must be removed and property managed and disposed. A Voluntary Assistance Project (VAP) may need to be initiated to ensure the hazardous materials/waste release has been properly cleaned up. See the HMD's VAP website for additional information: Voluntary Assistance Program ([sandiegocounty.gov](http://sandiegocounty.gov))  
<[https://www.sandiegocounty.gov/content/sdc/deh/hazmat/sam\\_voluntary\\_assistance\\_program.html](https://www.sandiegocounty.gov/content/sdc/deh/hazmat/sam_voluntary_assistance_program.html)> . Be advised, a release of hazardous materials and/or hazardous waste must also be promptly reported to California Office of Emergency Services at 1-800-852-7550 and the HMD at: (858) 505-6657. For more information on Spill Release Reporting, visit the State website at: <https://www.caloes.ca.gov/office-of-the-director/operations/response-operations/fire-rescue/hazardous-materials/spill-release-reporting/> <<https://www.caloes.ca.gov/office-of-the-director/operations/response-operations/fire-rescue/hazardous-materials/spill-release-reporting/>>

Please note, the HMD has the authority pursuant to state law and County Code to regulate facilities that handle or store hazardous materials and/or generate hazardous/medical wastes. The HMD will apply that authority as necessary to protect public health and the environment. Additional information about HMD can be found on our website at: Hazardous Materials Division ([sandiegocounty.gov](http://sandiegocounty.gov)) <<https://www.sandiegocounty.gov/content/sdc/deh/hazmat.html>>

Respectfully ,

Rita Raphael, Office Support Specialist

Department of Environmental Health and Quality

Policy, Outreach and Data

SanDiegoCounty.gov <<https://www.sandiegocounty.gov/>> | News Updates <<https://www.countynewscenter.com/>> | Engage <<https://www.sandiegocounty.gov/content/sdc/engagement/home.html>>

<<https://www.facebook.com/sdenvironhealth>> <<https://www.instagram.com/CountyofSanDiego/>>  
<<https://twitter.com/SDEnvironhealth>> <<https://www.youtube.com/countysandiego>>

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**From:** 'Julie M. Hamilton Julie at jmhamiltonlaw.com' via Evolve Student Housing Project <evolvecomments@sdsu.edu>  
**Sent:** Monday, September 9, 2024 4:08 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Re: Share Your Input about the Evolve Housing Project

Mr. Schulz and Ms. Peterson,

The College Area Community Council is requesting you extend the deadline for the College Area Community Council to comment on scoping of the environmental impact report for the Evolve Student Housing Project. Unfortunately, we did not have a quorum for the September meeting because it was the day after Labor Day. Several people were on travel and I was unavailable for medical reasons. We rarely have trouble reaching a quorum but the day after Labor Day is problematic.

We are asking SDSU to extend the comment deadline for the CACC to October 2, 2024 to allow the CACC to formerly approve a comment letter. Thank you for your consideration of this request.

Julie M. Hamilton

President

College Area Community Council

---

From: Robert Schulz, Associate Vice President of Real Estate, Planning & Development, and Kara Peterson, Director of Planning <evolvecomments@comms.sdsu.edu>  
Sent: Monday, September 9, 2024 4:00 PM  
To: Julie M. Hamilton <Julie@jmhamiltonlaw.com>  
Subject: Share Your Input about the Evolve Housing Project

<<http://click.comms.sdsu.edu/open.aspx?ffcb10-fec6167271670d78-fe2e15737d64067f7c1676-fe2e117171640575741c75-ff3215777460-fe2d16777d64077d771276-ff3713707565&d=110041&bmt=0>>

<<http://image.comms.sdsu.edu/lib/fe2e117171640575741c75/m/7/7733c889-d8b5-44b6-bed4-17ed1e4cb022.jpg>>  
Dear community members,

We extend our appreciation to those who were able to attend the two recent scoping meetings for the proposed Evolve Student Housing project, and who have provided input thus far. We also thank you for your questions and input. We are committed to keeping the community informed and engaged throughout the next phases of this process, and we encourage you to stay involved.

We are early in the project planning process for the multi-phased construction project, which, once completed, is designed to introduce up to seven residential buildings, approximately 5,200 new beds (4,500 net expansion), and one amenities building on campus. Additional information about the project design and logistics, potential impacts, and

mitigation efforts will be provided in the Draft Environmental Impact Report to be completed and shared in January 2025.

You are encouraged to share comments you want to be considered as part of the project Scoping that will inform the Draft Environmental Impact Report by Wednesday, September 25, 2024 via the following:

- \* Email [evolvecomments@sdsu.edu](mailto:evolvecomments@sdsu.edu) <<mailto:evolvecomments@sdsu.edu?subject=>> .
- \* Send comments by US Mail to Kara Peterson, Director of Planning, San Diego State University Planning, Design & Construction, 5500 Campanile Drive, San Diego, California 92182-1624.

If you would like to receive updates about the project, you can sign up via the online form <<http://click.comms.sdsu.edu/?qs=3494b5d1c7d6dd681b75d9d0f92bacd152dcd26df0ca9cdc6eb48ef022f086e99cf4d6d18b42950d12b8faf25a0fb783b2847830aecab2a04c190d385cf78a03>> .

More information about the project is available on the Evolve Student Housing project page <<http://click.comms.sdsu.edu/?qs=3494b5d1c7d6dd6855ea24db8233455bb8ccdd0c541b86f48f8779f0347d0b74a7ad09dad41027327e3f00146223e7fd6e05d609a4425303bc276d163177953b>> . The Notice of Preparation (NOP), Initial Study and Scoping Meeting Presentation are also available online <<http://click.comms.sdsu.edu/?qs=3494b5d1c7d6dd6899d9536fdec84de524f0a1f221e7310530757b2de86667682f270ac799f80289c08453a65e8bfd90fc5c1f319779ccd547e6e77d8b8c9ca>> .

Once again, thank you for your time, interest, and ongoing commitment to making this project a success for our university, our students and surrounding community.

Bob Schulz

Associate Vice President of Real Estate, Planning & Development SDSU Planning, Design and Construction

Kara Peterson

Director of Planning

SDSU Planning, Design and Construction

San Diego State University

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<<http://click.comms.sdsu.edu/?qs=3494b5d1c7d6dd683e9ab70e14dad15dcc69ba8959a7f07ffab72b0ffda41cc1fdb8c4487bcf6b1ff254a2afdbf252aee3f877da556cd7592315aaf757d8582e>>

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**From:** evolvecomments@sdsu.edu on behalf of Carla Conner <cconner@kpbs.org>  
**Sent:** Friday, September 13, 2024 3:06 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Concerns Overheard

Hi,

I was at the in-person session. Several concerns came up from other attendees that didn't seem too interested in writing them down so I am, just in case.

- 1) In regards to the units going up closer to the 8, and with no smoking allowed near a building entrance/on-campus, there was concern for smoking out back in the surrounding brush that could increase fire risk.
- 2) For the same buildings near the 8, there was concern regarding there only being one-way out of the cul-de-sac street in case of fire.
- 3) Sounded like the neighbors were hoping for a Fire Station to be built in that vicinity - around where the International Student office is located.

Thank you.

--

Carla Conner

Event Specialist

T 619-594-1490

cconner@kpbs.org <mailto:cconner@kpbs.org>

kpbs.org <http://kpbs.org/>

5200 Campanile Drive

San Diego, CA 92182

<http://www.kpbs.org/>

<<https://www.kpbs.org/one-book-one-san-diego>>

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**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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Meredith Williams, Ph.D.  
Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### **SENT VIA ELECTRONIC MAIL**

September 4, 2024

Kara Peterson  
Director of Planning  
California State University, San Diego  
San Diego State University 5500 Campanile Drive  
San Diego, CA 92182  
[kara.peterson@sdsu.edu](mailto:kara.peterson@sdsu.edu)

RE: NOTICE OF PREPERATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR THE EVOLVE STUDENT HOUSING PROJECT DATED AUGUST 23, 2024,  
STATE CLEARINGHOUSE NUMBER [2024080979](#)

Dear Kara Peterson,

The Department of Toxic Substances Control (DTSC) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Evolve Student Housing Project (Project). The proposed Project is the development of two new housing complexes on or adjacent to the main San Diego State University (SDSU) campus, which would provide additional student housing, dining, and auxiliary uses. There are two components to the proposed Project: the Peninsula Component, which is located adjacent to the main SDSU campus at the northern terminus of 55th Street, and the University Towers East Component, which would be located south of Montezuma Road, east and immediately adjacent to the existing University Tower on the main SDSU campus. The Peninsula Component would be located on an approximate 10.3-acre site. Development of the Peninsula Component would include demolition of all 13 existing

buildings, which presently house 702 students, and the phased development of one 9-story student housing building and five student housing buildings up to 13 stories that would contain a total of approximately 4,500 student beds. The proposed University Towers East Component would be developed on a 0.71-acre site located immediately east of the existing University Towers building. The existing University Towers parking lot would be demolished to allow for redevelopment of the site to include a new 9-story student-housing building that would accommodate approximately 720 beds. In total, development of the Proposed Project would result in 5,220 new student beds (net increase of 4,518 student beds to the main campus inventory

After reviewing the Project, DTSC recommends and requests consideration of the following comments:

1. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).
2. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition,

Kara Peterson  
September 4, 2024  
Page 3

sampling near current and/or former buildings should be conducted in accordance with [DTSC's PEA Guidance Manual](#).

DTSC appreciates the opportunity to comment on the NOP of a DEIR for the Evolve Student Housing Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

*Tamara Purvis*

Tamara Purvis  
Associate Environmental Planner  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Tamara.Purvis@dtsc.ca.gov](mailto:Tamara.Purvis@dtsc.ca.gov)

Kara Peterson  
September 4, 2024  
Page 4

cc: (via email)

Governor's Office of Planning and  
Research State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Dave Kereazis  
Associate Environmental Planner  
HWMP-Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

Scott Wiley  
Associate Governmental Program Analyst  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Scott.Wiley@dtsc.ca.gov](mailto:Scott.Wiley@dtsc.ca.gov)

---

**From:** evolvecomments@sdsu.edu on behalf of James F <jamesfuntas@gmail.com>  
**Sent:** Thursday, October 3, 2024 1:10 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Massive Evolve Project

To whom it may concern,

The concerns expressed here are for the massive Peninsula Project on 55th street. There is nothing in this area that comes close to the size and scope of this project. My concerns may be considered as NIMBY type comments, and I don't really care. This project amounts to a new small city one street away that will overlook my backyard. Both College Ave. and Montezuma to Fairmount freeway access is already so congested, it has to be the two worst offramps in the city. We already have 45 minutes traffic waits to get to the freeways whenever it is the first weeks of school or any SDSU event. Adding almost 5000 new beds is being sold to us as having less traffic but it is naive to think that all these people will stay in their apartments and use mass transit. There will be an increase in traffic in an area that is already overloaded. Additionally, this is another large SDSU project that does nothing to improve the community and will only be a detriment to those that already live here. It appears that the land on 55th is not in the SDSU territory and will be used for fully furnished skyscrapers leased by SDSU. It is clear that SDSU is moving from an educational institution to a real estate company to increase revenue.

As the single family homes disappear and get turned into mini-dorms or full fledged apartments, it has been difficult to watch this area become an extended campus of SDSU. I'm afraid this project will be the final nail in the coffin for our household and maybe that's the desired outcome; for us to leave this area so the school can scoop up our land one day.

I appreciate your consideration as this project poses a very difficult decision for our family.

-James

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**From:** Esteban Gomez <egomez8613@sdsu.edu>  
**Sent:** Tuesday, August 27, 2024 6:33 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Feedback about on campus housing

Good day, to whom it may concern.

I send this message to express as a whole my thoughts over the new program to provide more residence halls.

When it comes to housing, I completely understand that freshmen must live on campus. However, housing on-campus are more suitable for students who may follow these criteria:

- A) Have low to no income.
- B) Commute from far distances.
- C) Have no means of personal transportation.
- D) Have certain mental and/or physical disabilities.
- E) Quality for FAFSA.

These type of students would greatly benefit of on-campus housing the most as it makes it far accessible to reach classes and success in the long run.

I and many other of my peers have once discussed this topic both last year and at the beginning of this year. We all are in a position where we are the most disadvantaged as the one thing that is preventing us is the cost of rent being too high. We would all appreciate if these new residences are not only safe, clean, always being maintained, but that the monthly rent is much more affordable.

Housing must never be a luxury, every student with a level of disadvantage deserves a roof and walls to live on.

We hope this message is taken into proper action.

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**From:** 'Fran Greenstein' via Evolve Student Housing Project <evolvecomments@sdsu.edu>  
**Sent:** Thursday, September 5, 2024 2:25 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Project updates

Where is the best place to register for emails to be kept informed on this project?

Warm Regards,

<<http://www.cort.com/>>

Fran Garfinkel Greenstein

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**From:** evolvecomments@sdsu.edu on behalf of Amy Hernandez <amyhern7@gmail.com>  
**Sent:** Wednesday, October 2, 2024 8:23 PM  
**To:** Evolvecomments@sdsu.edu  
**Cc:** Larry Moreno Neighbor  
**Subject:** Concerns re: SDSU Development

To whom it may concern:

My family and I moved into College View Estates a little over 2 years ago. During that time I have witnessed the dramatic effects that SDSU students, construction, and activities can have on the local residential community. While a vibrant college presence has many positive effects on the communities that surround it, the main ways SDSU has negatively affected the local community include:

- high levels of traffic
- high levels of construction
- high parking needs
- high non-violent crime rates

These issues mainly arise from insufficient accommodations made for a population that is located in an area not designed to accommodate them.

As a local resident, I am deeply concerned with the plans to expand SDSU housing because they will likely exponentially worsen the aforementioned negative effects the campus already has on our community. I would like to know what the plans are for minimizing these negative effects to the local community.

Namely, what are the plans for:

- optimizing traffic in and out of the college with the influx of new college residents?
- providing \*on campus\* parking for the influx of new college residents?
- providing construction phases and plans that don't worsen the already poor traffic situation?
- provide a stronger police presence for response to non-violent crimes?

Continued growth is not sustainable in such a small area without careful thought and attention. SDSU is important, but it should not unilaterally supersede the local residential communities that surround it. I request that SDSU's development plans be responsive to the daily impacts that it has on its local neighbors when considering future expansion strategies. Thank you for your time and consideration.

Very Respectfully,  
Amy Hernandez

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**From:** Hayley Irwin <hirwin2884@sdsu.edu>  
**Sent:** Wednesday, September 4, 2024 6:17 PM  
**To:** Evolve Student Housing Project  
**Subject:** Evolve Student Housing Sustainability Plans

Hello,

I attended the information session today and have some questions regarding sustainability. Are there any estimates yet on the impact of this project? Are there plans for the building to become LEED certified? I enjoyed the presentation, thank you!

Best,  
Hayley Irwin

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**From:** evolvecomments@sdsu.edu on behalf of Karen Jorgensen <kjorgensen255@gmail.com>  
**Sent:** Wednesday, September 25, 2024 4:55 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** SDSU student housing on 55th and Montezuma 2025

To whom it may concern,

These are my thoughts, questions and concerns for the new proposed projects.

I would like to see a campus/community traffic study conducted that examines the impact of these new developments on the local arterial thoroughfares, Montezuma Road, 55th, Remington Rd. and College Boulevard.

How many bedrooms will there be in each proposed project? 4,000 units x 2 bedroom units x 2 occupants per room = 16,000 potential additional students / automobiles. Please clarify how many bedrooms are proposed to be accommodated in this development.

Parking will need to be addressed for those students that do not utilize the trolley or bus system. Potentially 16,000.

How many existing parking spaces will be omitted in the demolition of the existing apartments and Passport office?

It would be good to understand the impact on PS12 for concerts, Aztec sporting events and other on campus events in addition to the projected impact of this development.

What are the total number of spaces in PS12? How many of these are available on a weekly basis currently?

The impact of prolonged SDSU construction traffic to the CVE (College View Estates) area is ongoing, even in the absence of a current construction project of this magnitude.

When the most recent College View Apartments were being constructed on 55th Street, much of the construction traffic (large vehicles hauling equipment or construction materials) accessed the project through the CVE neighborhood.

Construction crews elected to park in segments of the CVE neighborhood that are not subject to the B parking permit requirement. The intersection of Yerba Anita Drive and Yerba Anita Way became a de facto parking area for crews that would be ferried to the job each morning via a rideshare van, during the construction of College View Apartments on 55th Street.

To mitigate this phenomenon, bidders for future construction projects could be instructed, in their bid documents, to park only on SDSU property or parking structures. Further, they should be instructed that all construction material and equipment deliveries are to enter from 55th street and to remain out of the residential neighborhood west of campus.

A Fire Evacuation Study for this project and its impact on the adjoining neighborhood should be conducted to assess the impact of this increase in population on the ability to evacuate the neighborhood in the event of an emergency.

Students, Uber drivers and their parents routinely disregard traffic and parking regulations. They park in red zones & double park with apparent impunity. They also make illegal U-turns. They cross the street with disregard to oncoming traffic. The police seem either unable or unwilling to reign in this behavior. So, it is reinforced as being acceptable. The corner of 55th and Remington is already a dangerous traffic location. Adding 16,000 more residents will do nothing to ameliorate this situation.

Students that do not use the trolley or the bus are opportunistic and, wanting to save cost, park their cars long term in the CVE neighborhood reducing the availability of parking for the residents that live there. An expansion of the B parking permit would help. Please support CVE in the expansion of B area parking.

A portion of the property in Mission Valley that was the former site of Jack Murphy Stadium is owned by SDSU and is a single trolley stop away from the Montezuma Mesa campus. This would be a logical and eminently more acceptable location to build residences for this many more students. Housing there could be accompanied by an incentive for students to use the trolley FREE to get to campus. This environment could be an collaborative and supportive environment for grad students and underclassmen.

Please be considerate of the community in which you exist. Preserve the views to the north and east from the CVE neighborhood. These views are defining elements of the neighborhood and deserve to be preserved. SDSU can both thrive and be a good neighbor simultaneously. Continued growth, with no end game, is unsustainable for such an institution. CVE residents support SDSU, attend concerts, sporting events and the theater. Many are alumni and are proud of the University and its many contributions to the city. We request that SDSU's development plans be more responsive to the daily impacts that the University has on the neighborhood when considering this and future expansion strategies.

Sincerely,  
College View Estate Resident 27 years, and SDSU Alumni.  
SDSU Men's Basketball Season Ticket Holder

Karen Jorgensen, CID, NCIDQ  
5049 Yerba Anita Way

San Diego, CA 92115  
(619) 796-8973

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**From:** evolvecomments@sdsu.edu on behalf of Marialuisa Kaprielian  
<mlkaprielian@sbcglobal.net>  
**Sent:** Thursday, September 19, 2024 9:12 AM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Evolve Student Housing Project

As a resident neighbor west of SDSU I am writing to request that the buildings are built only 4 story high with no parking. If SDSU really wants to go 13 floors high, it should look at building on the soccer field next to parking structure 12.

Since these buildings will be within walking distance to a major transit system the residents will enjoy the services shown bellow for transportation- **a transit evacuation proposal to the neighborhood will be required otherwise.**



# SDSU TRANSPORTATION PROGRAMS MISSION STATEMENT

Our programs' mission is to reduce the University's carbon emissions by:

- Decreasing the number of drive-alone commutes
- Encouraging mode-shifts in transport in and around campus
- Accommodating parking demands on campus in a sustainable way

# Daily-Choice Parking

Daily-choice parking is now available. You can park for \$4.75/day in Structure F PayByPhone app.

**Biking,  
Scooters, &  
Skateboarding >**

**Lyft & Uber >**

**Red & Black  
Safe Ride >**

**619-808-5662**

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**From:** 'Rene Kaprielian' via Evolve Student Housing Project <evolvecomments@sdsu.edu>  
**Sent:** Saturday, September 14, 2024 11:29 AM  
**To:** evolvecomments@sdsu.edu  
**Subject:** 55th Street proposal

Here are my comments regarding this project. I live west of campus on Remington Rd.

This area can certainly be redeveloped but it seems like there is a "cram as much into a space as possible" mentality, without a lot of thought regarding scale and proximity to the trolley and how people will flow through the area and the overall campus.

1. Heights up to 13 floors is way too high and not in scale with anything around that area. If anything, four to six floors is more reasonable.
2. Fire hazard along the canyons with no evacuation plan to move so many people, including the existing dorms and people from the adjoining neighborhood.
3. The intersection at 55th and Canyon Circle will be congested with pedestrians, skateboarders and bikes. How will vehicle traffic get through this intersection? Foot bridges? This will need to be worked out or it will be a traffic disaster and see comment 2 regarding fires and evacuation.
4. If SDSU really wants to go 13 floors high, it should look at building on the soccer field next to parking structure 12. It is low into the canyon so it's height will be less dramatic up on the main campus.
5. SDSU should be conducting a detailed traffic study and should not be trying to use a study from another university which it has done in the past.
6. How much parking will there be per bed for these buildings?
7. Why isn't SDSU looking at building a 13-floor structure above the parking structure on Lindo Paseo behind the KPBS building and Extended studies building? It is close to the trolley and this street is on flat land. Also why not build on parking lot 2 and 2A east of College Ave.?

Rene Kaprielian

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**From:** Dominic Keiser <dkeiser8501@sdsu.edu>  
**Sent:** Saturday, September 28, 2024 12:45 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Evolve Housing Project

Hi, my name is Dominic Keiser and I am a student at SDSU. I am a Real Estate major and I am doing a presentation on the Evolve Student Housing project and was wondering if you had any Renderings for the project? If you can get back to me that would be great.

Thank you,

-Dominic Keiser

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## Tuesday Christopher

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**From:** 'Eric Kelley ekelley8280 at sdsu.edu' via Evolve Student Housing Project <evolvecomments@sdsu.edu>  
**Sent:** Thursday, September 26, 2024 7:20 AM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Re: Share Your Input about the Evolve Housing Project

Mr. Schultz and Ms. Peterson,

My name is Eric Kelley. I am the PM of an SDSU Fowler College of Business MBA consulting team that is researching potential uses of AI in the construction RFP and proposal process. As part of our efforts in researching and assessing ways to utilize AI to optimize the construction RFP and proposal process, we would love to spend a half hour interviewing each of you regarding this exciting project.

Could you please respond to this email with a time within the next 2 weeks that works best for you to sit down (virtually) to talk to us about your thoughts on utilization of AI in construction RFPs and Proposals?

V/r,  
Eric Kelley  
Project Manager  
SDSU Consulting Team  
Fowler College of Business, SDSU  
619-977-7868

On Mon, Sep 9, 2024 at 4:02 PM Robert Schulz, Associate Vice President of Real Estate, Planning & Development, and Kara Peterson, Director of Planning <evolvecomments@comms.sdsu.edu <mailto:evolvecomments@comms.sdsu.edu> > wrote:

<<http://click.comms.sdsu.edu/open.aspx?ffcb10-fec6167271670d78-fe611170756207787c16-fe2e117171640575741c75-ff2b15767262-fe621d727666017e7511-ff3916707560&d=110044&bmt=0>>

<<http://image.comms.sdsu.edu/lib/fe2e117171640575741c75/m/7/7733c889-d8b5-44b6-bed4-17ed1e4cb022.jpg>>  
Dear community members,

We extend our appreciation to those who were able to attend the two recent scoping meetings for the proposed Evolve Student Housing project, and who have provided input thus far. We also thank you for your questions and input. We are committed to keeping the community informed and engaged throughout the next phases of this process, and we encourage you to stay involved.

We are early in the project planning process for the multi-phased construction project, which, once completed, is designed to introduce up to seven residential buildings, approximately 5,200 new beds (4,500 net expansion), and one amenities building on campus. Additional information about the project design and logistics, potential impacts, and mitigation efforts will be provided in the Draft Environmental Impact Report to be completed and shared in January 2025.



You are encouraged to share comments you want to be considered as part of the project Scoping that will inform the Draft Environmental Impact Report by Wednesday, September 25, 2024 via the following:

- \* Email [evolvecomments@sdsu.edu](mailto:evolvecomments@sdsu.edu) <<mailto:evolvecomments@sdsu.edu?subject=>> .
- \* Send comments by US Mail to Kara Peterson, Director of Planning, San Diego State University Planning, Design & Construction, 5500 Campanile Drive, San Diego, California 92182-1624.

If you would like to receive updates about the project, you can sign up via the online form <<http://click.comms.sdsu.edu/?qs=d093907cb17aec6f278ac90e1e3638a775e51d4ff0c102ffee97e245ebc4aa7f40ea5c642a69d456c0cab058341ddb3f94dc106eafa8703b32f3d198b50f22ee>> .

More information about the project is available on the Evolve Student Housing project page <<http://click.comms.sdsu.edu/?qs=d093907cb17aec6f752f13e934bab27448d41566433f3874b54624145a5fbb2fc502e3612b2d676e508947c88cb204c92b92f5cf53a8bd1fa7a5b95744e74beb>> . The Notice of Preparation (NOP), Initial Study and Scoping Meeting Presentation are also available online <<http://click.comms.sdsu.edu/?qs=d093907cb17aec6f05ffe92bfeab0207e0ebb8348669eceac00a3b70e19c1ebffdeb43b8fa5d1b6ba7effde19234310b0af395a9f27edee6b5614a7513874c37>> .

Once again, thank you for your time, interest, and ongoing commitment to making this project a success for our university, our students and surrounding community.

Bob Schulz  
Associate Vice President of Real Estate, Planning & Development SDSU Planning, Design and Construction

Kara Peterson  
Director of Planning  
SDSU Planning, Design and Construction  
San Diego State University  
Digital Privacy Statement  
<<http://click.comms.sdsu.edu/?qs=d093907cb17aec6f9083e6ce03f96b435500313750e19f2f3b2e21bf1d4da7ffa56678696296465fc56c4d0665d389382d180aaf98aeca28bd999dfd3c354afd>>  
View as web page  
<<http://view.comms.sdsu.edu/?qs=0cbc1bc0f9bd9e376335ad74216cd38e2f817b3991ffaead0c26eaf253c9d6d6198f715c06a61cbe5a0dab370e0640e44e110e4721c8590be2e0ef77a53c182c0bee1daf77118f3c3bf803d16448269>>

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Thank you,  
Eric Kelley  
MBA Graduate Student  
[ekelley8280@sdsu.edu](mailto:ekelley8280@sdsu.edu) <<mailto:ekelley8289@sdsu.edu>>  
619-977-7868

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**From:** evolvecomments@sdsu.edu on behalf of Andrew Bowen-Ataide <abowen@kpbs.org>  
**Sent:** Wednesday, August 28, 2024 2:51 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Re: Invitation to Learn about Proposed Student Housing Project

Hi,  
Andrew Bowen here, I'm the metro reporter for KPBS. I'm reaching out because I'm interested in knowing whether SDSU considered seeking a CEQA exemption for this project under [SB 886](#). The law offers CEQA exemptions for student housing built by public universities if the project is LEED Platinum certified and the project's impacts are fully mitigated. I know the bill has had some implementation problems, which the author is attempting to tackle with [SB 312](#).

Is someone available to chat with me about this project soon, even if it's off the record? I'm not working on a story yet, but I am interested in doing more reporting on student housing and would love to learn more about this project. Please reach out if you have any questions!

Best,  
Andrew

On Tue, Aug 27, 2024 at 3:30 PM SDSU Planning, Construction and Design and SDSU Office of Housing Administration <[evolvecomments@comms.sdsu.edu](mailto:evolvecomments@comms.sdsu.edu)> wrote:



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Dear SDSU students, faculty, and staff,

We are pleased to invite you to a Notice of Preparation (NOP) Scoping Meeting regarding Evolve Student Housing, a multi-phased construction project designed to introduce up to seven residential buildings and one amenities building on campus. This project aims to add thousands of new beds on campus, offering financially accessible, convenient, and safer housing for our students, while also benefiting the surrounding community.

The project is subject to approval by the California State University's

Board of Trustees, and will be before the board sometime in mid-2025. In the interim, the university is providing information and offering opportunities for input as part of the environmental review process known as the California Environmental Quality Act (CEQA).

You are invited to attend public meetings to be held in September, as follows:

- **Date:** Wednesday, September 4, 2024
- **Time:** 5:30 p.m. to 7:00 p.m.
- **Location:** Montezuma Hall located at the Conrad Prebys Aztec Student Union
  
- **Date:** Thursday, September 5, 2024
- **Time:** 3:00 p.m to 4:00 p.m.
- **Location:** Via [Zoom webinar](#)

During the meetings, we will present the project overview, discuss the environmental review process under the California Environmental Quality Act (CEQA), and outline potential environmental impacts. At the in-person meeting on Sept. 4, there will also be several stations to learn more about the project. Both sessions are opportunities for you to learn more and provide written input on the scope and content of the Environmental Impact Report (EIR) that will be prepared for the project.

Your feedback is invaluable in ensuring this project meets the needs of our students and community. To provide comments, email [evolvecomments@sdsu.edu](mailto:evolvecomments@sdsu.edu). More information is available on the [SDSU Housing site](#).

*SDSU Planning, Construction and Design*

*SDSU Office of Housing Administration*

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## Tuesday Christopher

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**From:** 'Guthre Leonard gleonard4008 at sdsu.edu' via Evolve Student Housing Project <evolvecomments@sdsu.edu>  
**Sent:** Thursday, August 29, 2024 4:03 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Re: Invitation to Learn about Proposed Student Housing Project

Hello,

I was unable to make either of the meetings for this. Is it possible that the zoom meeting was recorded? If not, are there at least slides that I could view to get a general overview of the proposal?

Best,  
Guthre

On Tue, Aug 27, 2024 at 3:31 PM SDSU Planning, Construction and Design and SDSU Office of Housing Administration <[evolvecomments@comms.sdsu.edu](mailto:evolvecomments@comms.sdsu.edu)> wrote:



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**From:** evolvecomments@sdsu.edu on behalf of W Hugh Lyford, M.D. <whlyford@gmail.com>  
**Sent:** Thursday, September 19, 2024 8:12 AM  
**To:** evolvecomments@sdsu.edu; CVEA College View Estates Association  
**Subject:** Statement of concern re: evolve housing

To whom it concerns,

I am writing to express concerns regarding the Evolve student housing project planned for the peninsula on 55th Street. I am specifically concerned regarding the effects of such high density housing through the surrounding neighborhoods, overflow of student parking into the surrounding neighborhood and the aesthetic effects of such large buildings so prominently placed along the canyon crest of Montezuma mesa.

First and foremost, my concern is traffic influx and efflux through the surrounding neighborhoods. The density increase the project if proposing is massive, and without explicit directions regarding parking and egress from the campus when driving, I am concerned that students will continue to use the neighborhood as a passthrough to leave campus via a route avoiding 55th street to Montezuma, which is frequently congested and slowed by traffic lights. Instead students cut through the neighborhood west of campus, where there is little impediment to speed or traffic control. Already, we have major issues with students driving fast and erratically through the neighborhood, which raises major concerns to the residents. I personally have had several occasions where I have been out with my young children biking, and have had to wave down a student driving too fast or unsafely through the neighborhood. The increased traffic through the neighborhood will impact parking, residents ability to enter and leave their driveways and certainly an increase in pedestrian injuries, as many neighborhood residents walk or bike in the area. I feel that if this project were to proceed as planned, there would need to be a strategy in place to limit traffic into the neighborhood, for example a gate at the Remington Rd near the aquaplex/tennis courts, to limit non-resident traffic. I realize this is an added expense, but good will with the surrounding neighborhoods and safety for neighborhood residents, including students who reside in the neighborhood, should be a top priority in this planning phase. Besides, the President of the University's neighborhood closeby is gated. If gating is necessary to reduce unwanted traffic in the President's neighborhood--the person who should be most closely attuned to student and community issues--I don't understand why we in the surrounding neighborhood should suffer.

Second concern is the overflow of student parking in the neighborhood. Much of the fundamentals of this concern can be inferred from the information above, but it bears additional emphasis. Already, students take advantage of the surrounding, un-permitted neighborhoods to park their vehicles, often for weeks on end. Students don't want to pay for expensive garage parking on campus, and instead find an unmetered resident spot nearby and park for extended periods. When you drive through the College View Estates neighborhood, it is always very clear where permit parking ends, as the street-parked car density doubles or triples. I can only imagine how much worse this will get with a roughly 500% increase in student density immediately adjacent to this neighborhood. What worse, the project proposes *eliminating* an existing 350 parking spots, with no plans for any new parking. While there currently

appears to be parking to accommodate roughly 40% of the residents, you state no plan on how to accommodate parking for this 500% increase. Residents in that neighborhood deserve the right to park in front of their homes, or provide reasonable parking for workmen, visitors or relatives. I anticipate this will become near impossible with the addition of 5x more students trying to find free parking. I would propose that the university plan to provide free or significantly reduced parking to residents of these structures to avoid this need to park on the street. This fee can be directly built into housing costs, or the university can underwrite the expense with the massive increase of revenue they will incur with the addition of so much student housing revenue. Another alternative is to create direct access from the buildings down to Lot 15, which is entirely underutilized by the University as a dumping ground for old vehicles and office furniture. Revamp that parking lot with well-organized, dense parking with parking stickers for students residing in Evolve housing. This will solve both problems as above, as it will naturally incline students to take the fastest route off campus along Canyon Crest drive to College Avenue, thus reducing neighborhood traffic as well as alleviating the parking issues.

Finally, the impact of the size of the proposed building cannot be ignored. 13-story buildings perched on the mesa edge will totally change the landscape of the mesa, which is currently unadulterated by high-rises. Many local residents have enjoyed the views from their homes for 40, 50, 60 years. While we can appreciate the need for increased, high-density housing, we don't see the need to set new height records so prominently on the mesa.

In closing, we in this neighborhood are closely tied to the university. My spouse is a tenured professor at SDSU and I am a big SDSU fan, holding season tickets for football and basketball. We love being a part of the university community. Many, if not most, in our neighborhoods feel the same. This is also a family neighborhood, with students and community members living side-by-side (mostly) happily. If this project goes forward as planned, I know many in our neighborhoods will sell their homes and move because of valid concerns regarding safety, density and aesthetics. As student density increases, this will drive more to either sell or rent, and the character of the neighborhood will be fundamentally changed. It will also undercut the university's ultimate goal to drive students back to living on campus, as they will be more able to find closely adjacent, high-density homes with free parking to rent. Please take the neighborhood concerns into account NOW to avoid gutting a historic San Diego neighborhood and alienating your surrounding neighbors.

Thank you!

Hugh Lyford

College View Estates Resident

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**From:** Lisa Marun <emarun@sdsu.edu>  
**Sent:** Tuesday, September 10, 2024 2:55 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Environment and People

Hello,

Thank you for the invitation to share comments to inform the Evolve Housing Project Draft Environmental Impact Report.

First, do you have a recording or the September 5 meeting (I see only the slides)?

Also, I'd like to share that I am proud to be part of the SDSU community, which I have found to be nothing but caring, considerate, and respectful when it comes to how people communicate and interact with each other. Inclusivity, acceptance, and finding strength in diversity are all principles that are all fully alive here.

However, as someone whose work is focused on helping people connect with and better steward nature, I do wonder at the lack of the same sort of concerted effort at SDSU to ensure that care, consideration, and respect for the environment/nature aren't also part of the everyday discourse that I see from campus communications. The health of our individual and collective relationship with the environment is as important for our wellbeing as our connections with other people.

Aside from meeting EIR requirements, I would like to see this substantial project be a step towards making a stronger connection with nature and the environment be a more integrated part of the daily discourse and culture of our SDSU community.

After more than two decades of work in environmental law, research, and outreach, I have too many ideas to put down in this short note. However, briefly, I hope to see every consideration made to avoid having this construction become a heat island, from the building and paving materials used to consideration of rooftop gardens (maybe a combination garden/cafe or two).

I also hope to see areas connected to this project that actively support native habitat **expansion**. This would be a great asset to the campus in terms of improving wellbeing for humans and nature and also serving as a learning experience for us all (e.g., this space could be used by students to conduct research, volunteer, and more). SDSU might set out the goal to become a [Bee Campus](#), a [Homegrown National Park](#), and/or something similar to help guide a collective planning process.

And as part of this collective planning process, my hope is that the SDSU community will be invited to participate in more ways than just through comments. Are there students studying environmentally friendly building materials? Do we have faculty that have various sorts of expertise in healthy native local habitats? Yes! We do! Let's aim to have

this project of such grand scale be about both valuing our people community and our natural ecosystem communities in tandem.

Thank you for considering my thoughts,

Lisa

**Lisa Marun**

Research Specialist

*SDSU Research Foundation*

[emarun@sdsu.edu](mailto:emarun@sdsu.edu)

C: 858-437-4986

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**San Diego State University** | [SDSU.edu](https://www.sdsu.edu)

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Indigenous Residence: Kumeyaay

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**From:** 'Shanika Mcallister smcallister1299 at sdsu.edu' via Evolve Student Housing Project <evolvecomments@sdsu.edu>  
**Sent:** Tuesday, August 27, 2024 4:12 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Re: Invitation to Learn about Proposed Student Housing Project

Does this include grad housing?

On Tue, Aug 27, 2024 at 3:32 PM SDSU Planning, Construction and Design and SDSU Office of Housing Administration <[evolvecomments@comms.sdsu.edu](mailto:evolvecomments@comms.sdsu.edu)> wrote:



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- **Time:** 3:00 p.m to 4:00 p.m.
- **Location:** Via [Zoom webinar](#)

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*SDSU Planning, Construction and Design*

*SDSU Office of Housing Administration*

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**From:** Anne E. McMills <amcmills@sdsu.edu>  
**Sent:** Sunday, September 8, 2024 10:02 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** comments on Evolve Student Housing

To Whom it May Concern:

Thank you for the very useful webinar the other day regarding the Evolve Student Housing Project. I am a faculty member, graduate advisor, and graduate admissions coordinator. I'm excited for the expansion of housing options since my graduate students often come from out of state and moving to San Diego can have a lot of sticker-shock. I am asked every year about the possibility of graduate housing and met with a lot of disappointment when there isn't any.

So my comments are:

1) Ideally there will be graduate housing included in the scope. Or if not specifically graduate housing (as was mentioned in the webinar) perhaps a building or section of the building that is for older students, married students, students with families, etc. as graduate students may be. That way they are not housed among a bunch of frat-house-destined freshmen so that they can get their work done in peace and have a stress-free home.

2) Ideally the housing would be year-round. I've seen other student housing in the past that said it was August through May. My graduate students move here for good so they do not go home during the summer like an undergraduate might.

3) Have a competitive down-payment process (if that is even something the student housing has). When my graduate students begin looking for housing in San Diego they are often asked for first and last month's rent. This is before their financial aid comes in so it can be very tough along with the costs of moving across the country. Figuring out a way to make the process more student-friendly and welcoming would be the goal.

Thank you for considering my comments.

Sincerest thanks,

--

Anne E. McMills

Professor, Head of Lighting Design & Technology Graduate Advisor - Design & Technology Graduate Admissions - Design & Technology San Diego State University

School of Theatre, Television & Film

Indigenous Residence: Kumeyaay

Indigenous land borrowing/occupying: The Kumeyaay [tff.sdsu.edu/mfa\\_theatre\\_design](http://tff.sdsu.edu/mfa_theatre_design)

<[http://tff.sdsu.edu/mfa\\_theatre\\_design](http://tff.sdsu.edu/mfa_theatre_design)>

Office: DA215

she/her/hers

[amcmills@sdsu.edu](mailto:amcmills@sdsu.edu) <<mailto:amcmills@sdsu.edu>> [www.annemcmillslighting.com](http://www.annemcmillslighting.com)

<<http://www.annemcmillslighting.com/>>

<[https://ci3.googleusercontent.com/mail-](https://ci3.googleusercontent.com/mail-sig/AlorK4y4QkNzhu9ez6pgxGbhnGya5TpFjcl8Ze3qn4rxSoal8RKOfcWGKer33wTaVXhF_FqRGXM5nKFNCBE9)

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Author of: The Assistant Lighting Designer's Toolkit <<http://www.aldtoolkit.com/>> and 3D Printing Basics for Entertainment Design <<http://www.3dpbasics.com/>>

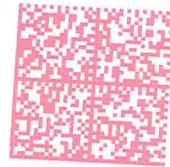
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State of California  
Native American Heritage Commission  
1550 Harbor Blvd., Ste. 100  
West Sacramento, CA 95691



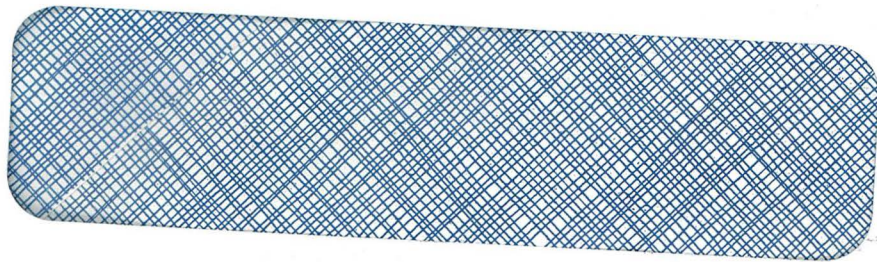
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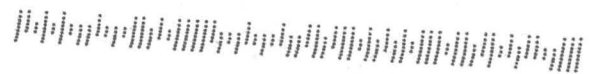
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# NATIVE AMERICAN HERITAGE COMMISSION



August 29, 2024

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1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)

## Re: 2024080979 Evolve Student Housing Project, San Diego County

Dear Ms. Peterson:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).



The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([https://ohp.parks.ca.gov/?page\\_id=30331](https://ohp.parks.ca.gov/?page_id=30331)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. 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.
  - a. 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.

- b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
- a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: [Pricilla.Torres-Fuentes@NAHC.ca.gov](mailto:Pricilla.Torres-Fuentes@NAHC.ca.gov).

Sincerely,

*Pricilla Torres-Fuentes*

Pricilla Torres-Fuentes  
Cultural Resources Analyst

cc: State Clearinghouse

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**From:** evolvecomments@sdsu.edu on behalf of Mark Nelson (Home Gmail)  
<menelson@gmail.com>  
**Sent:** Friday, August 30, 2024 5:39 PM  
**To:** evolvecomments@sdsu.edu; Kara Peterson Dir of Planning SDSU  
**Subject:** Please provide the CEQA NOP for the Evolve Project

I cannot find it on CeqaNet. I am an abutting property owner (we share a lot line with SDSU) and I was not served the NOP, if in fact it has been issued.

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evolvecomments+unsubscribe@sdsu.edu <mailto:evolvecomments+unsubscribe@sdsu.edu> .

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**From:** evolvecomments@sdsu.edu on behalf of Mark Nelson (Home Gmail)  
<menelson@gmail.com>  
**Sent:** Friday, August 30, 2024 6:47 PM  
**To:** Kara Peterson Dir of Planning SDSU; rschultz@sdsu.edu; evolvecomments@sdsu.edu  
**Subject:** Please provide online participation information for the public NOP meetings

We have only learned of this project today. Nothing that I've seen so far contains SCH numbers or a formal NOP. Since you have apparently started the clock on the NOP, the many offsite property owners and disabled folks that are stakeholders will require remote access.

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**From:** evolvecomments@sdsu.edu on behalf of Mark Nelson (Home Gmail)  
<menelson@gmail.com>  
**Sent:** Thursday, September 5, 2024 7:04 PM  
**To:** Trustee Secretariat; evolvecomments@sdsu.edu; cityattorney@sandiego.gov;  
MayorToddGloria@sandiego.gov; CouncilMember Sean Elo-Rivera; CVEA College View  
Estates Association  
**Subject:** Public Comment - CSU Trustees and SDSU CEQA NOP - SDSU Evolve Project NOP

Based on the de minimis work that has been provided to the public on the proposed project, the checklist appears complete, in that it requires a full EIR in all categories of CEQA. The NOP errs on its discussion of zoning. The RM-3-9 and RM-4-10 zoning is binding on the project as the land is not part of the university land grant nor a State enclave. The project is further in violation of the stated intent of the zoning. Unlike the campus, the land in question is not a State of California enclave. It is City of San Diego jurisdictional land that was purchased by a foundation and cannot be simply converted to State enclave. If that were the case, the university could purchase several abutting R-1 homes, demolish them, and convert the site to a 10-story dormitory. However, that is clearly NOT the case, nor is it reasonable to assume such action in the current City of San Diego jurisdictional areas. One can reasonably assume that the surrounding neighborhoods will fight any conversion of zoning and City officials are included on these comments.

Zoning Designation: RM-3-9

Jurisdiction: City of San Diego

The purpose of the residential zones is to provide for areas of residential development at various specified densities throughout the City. The residential zones are intended to accommodate a variety of housing types and to encourage the provision of housing for all citizens of San Diego. It is also intended that the residential zones reflect desired development patterns in existing neighborhoods while accommodating the need for future growth.

Mark Nelson

Abutting Landowner to SDSU State Enclave lands

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evolvecomments+unsubscribe@sdsu.edu <mailto:evolvecomments+unsubscribe@sdsu.edu> .

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**From:** evolvecomments@sdsu.edu on behalf of Dino Richardson  
<dinorichardsonsemail@gmail.com>  
**Sent:** Thursday, October 3, 2024 12:38 AM  
**To:** evolvecomments@sdsu.edu  
**Subject:**

Kara Peterson,

I wanted to share some of my concerns with you regarding the proposed peninsula component of the new student housing project.

How will a project of this size affect local sewer, water and internet speeds in the area? When the Chapultapec dorm was built, the local sewer system was overloaded and repeatedly caused the sewer line to back up into the downstairs of my neighbor's house across the street from my property. How does SDSU plan to prevent this from happening or respond to resulting occurrences?

Students residing in the Chapultapec dorm regularly deposit trash into Aztec Canyon. SDSU fails in its stewardship to perform regular canyon cleanup. How will SDSU ensure good stewardship to keep the canyons surrounding the proposed peninsula project clean?

Students who may not be authorized to keep a vehicle while residing in the peninsula site dorms, may nonetheless do so, as we often see with the existing Chapultapec dorm. A project of this size is sure to cause a number of unauthorized student vehicles to be parked on the streets in the College View neighborhood. Does SDSU plan to help police unauthorized student parking in the College View neighborhood?

The site of the proposed peninsula component appears to be outside of the SDSU campus and would therefore fall under the purview of the City of San Diego's building codes, canyon review, EIR, etc... Has SDSU received city permits to build these proposed structures and at the heights outlined in the proposed project?

Sincerely,

Dino Richardson  
College View Estates property owner and resident

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**From:** evolvecomments@sdsu.edu on behalf of Susan Richardson <dprsmr@gmail.com>  
**Sent:** Tuesday, October 1, 2024 1:38 PM  
**To:** evolvecomments@sdsu.edu; Diana Lara  
**Subject:** Evolve Student Housing Comments

Evolve Student Housing Comments:

The following comments are submitted in response to the Notice of Preparation and Scoping of a Draft EIR for the proposed Evolve Student Housing project as presented to the College Area Community in September 2024.

1. Parking: "The residential buildings that are currently on the Peninsula Component support approximately 315 parking spaces. Once all buildings are demolished, approximately 15 parking spaces could be constructed near the entrance of the new housing complex and 2 truck spaces at the amenity building. These 17 spaces would be reserved for accessible parking spaces, staff, short-term parking, and for loading and unloading. Parking for those student residents with vehicles would be available in existing SDSU parking lots and structures. Once constructed, the proposed University Towers East Component would result in a reduction of 125 parking spaces. A total of 6 new parking spaces would be constructed near the entrance of the proposed University Towers East Building. As with the Peninsula component, parking for student residents of the University Towers East Component would be available in existing SDSU parking lots and structures." (Initial Study, p. 5.) Comment: This is acceptable for the students living there only if two major issues are taken into account for both projects. a. Temporary parking/traffic for pick up/drop off - parents, rideshare, move in (already a nightmare for existing dorms on Remington) and b. Solutions are created for where those thousands of students would park on event days when the parking garages are closed? Event days will cause either students or event goers to park in the adjacent neighborhoods causing even more impact, therefore, more on campus parking needs to be provided to accommodate the new students. Note: There was no information provided on the impacts on greenhouse gases caused by the loss of existing parking and the increased demand on existing parking facilities. A lack of adequate parking will result in cars driving around for available parking increasing emissions over the existing condition. There will not be an increase in public transportation, and Rideshare, still counts as two trips per car.

2. The project timeline is very aggressive with proposed construction of Phase 1A to begin in May 2025 which is the same as the date of the anticipated approval of the Final EIR by the CSU Board. How can you take bids on a project that has not been approved and mitigated? No planned construction should be scheduled until after the adoption date.

3. The project description allows no concept plan for the public to be able to make comments on impacts. As a resident of the adjacent College View Estates neighborhood there is no information of impact to my view shed, light, noise, etc without the siting of which 13 or 9 story building is proposed to go where. Currently, from our home on Hewlett Dr, we have a view of Cowles Mtn and Del Cerro to the west, and a morning sunrise and Hardy bell tower on campus to the east. Not knowing the plan does not allow for an adequate comment, therefore, since the entire peninsula is currently zoned RM Multi- (3-9 medium density) it should remain that way and NO 13 story buildings should be permitted Other than one dorm, there is not ather 13 story building in the entire College Planning Area and that density would be impactful the environment, traffic, noise, and City of San Diego services.

4. We have no information on the amount of disturbance to environmentally sensitive lands - which are part of the MSCP program. The project must comply with all MSCP requirements surrounding the property.

5. We are very concerned about the lack of egress in the event of fire evacuation for the number of proposed additional residents adjacent to the canyons and Alvarado creek tributaries which are rated as very high fire hazard areas. Please provide a thorough evaluation of the risk of wildfire and evacuation plans for not only the 4,500 peninsula residents, but also the College View Estates neighborhood which only has two ways to evacuate, one of which is shared with Alvarado Estate.

6. The assumption that student needs will be met on campus or even in the College Area, with inadequate parks, open space and community services to support the existing community is unrealistic. The new student population will have an impact on nearby community services such as fire, SDPD, roads, parks and pedestrian crossings.

7. Traffic: 55th Street and Remington are already very dangerous with pedestrians, skateboarders, illegal parking and u-turns, no enforcement, and traffic on a regular basis, (even more so on event days), requiring travel through the neighborhood back streets to avoid university impacts and traffic.

Susan Richardson  
5433 Hewlett Drive

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**From:** evolvecomments@sdsu.edu on behalf of Chris Schultz <cmhschultz@gmail.com>  
**Sent:** Friday, September 6, 2024 7:23 AM  
**To:** evolvecomments@sdsu.edu  
**Subject:** proposed new dorms/comments

Residents in the surrounding area have had to put up with students parking outside of campus. What is SDSU going to do about that responsibility? Who's to stop a freshman from parking a car outside of the parking permit boundary? Upperclassmen definitely have cars and like their off campus freedom with parties and gatherings. Simply making something comparable in neighborhood rent may not be enough. The student soccer field adjacent to a parking structure would have been a great place to put a student apartment tower connected to parking and the campus. Just cramming kids into dorms to take their rent money doesn't look at the entire picture.

Chris Schultz

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# San Diego County Archaeological Society, Inc.

Environmental Review Committee

16 September 2024

To: Ms. Kara Peterson, Director  
Facilities Planning, Design and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California 92182-1624

Subject: Notice of Preparation of a Draft Environmental Impact Report  
Evolve Student Housing Project

Dear Ms. Peterson:

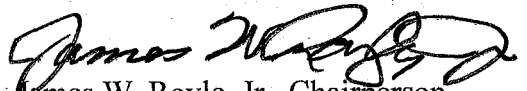
Thank you for the Notice of Preparation for the subject project, which was received by this Society last month.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DEIR and look forward to reviewing it during the upcoming public comment period. To that end, please include us in notification of the public review of the DEIR and ensure availability of a copy of the cultural resources technical report(s) that has been edited for public distribution.

**Please note that mail to SDCAS, for this and future projects, should be sent to us at P.O. Box 81106, San Diego, California 92138-1106. The Notice of Preparation for this project was sent to an incorrect address and it took some effort and inconvenience to actually receive it.**

SDCAS appreciates being included in the environmental review process for this project.

Sincerely,

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

cc: SDCAS President  
File



**San Diego County  
Archaeological Society**

P.O. Box 81106  
San Diego, CA 92138-1106

SAN DIEGO CA 920

17 SEP 2024 PM 1 L

Mail a smile.



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

92182-162400







Sierra Club San Diego Chapter  
4241 Jutland Drive, STE 303  
San Diego, CA 92117

Kara Peterson, Director of Planning  
5500 Campanile Drive San Diego,  
California 92182  
[evolvecomments@sdsu.edu](mailto:evolvecomments@sdsu.edu)  
Sent via email.

Dear Director Peterson:

Sierra Club San Diego is providing comments on the notice of preparation for the Evolve project and dormitory construction at San Diego State University.

Sierra Club San Diego is supportive of the Evolve Project (hereafter Project) which has minimal environmental impact and provides over 5,000 units of needs housing for SDSU and San Diego. Like the Conrad Prebys Student Union, the Aztec Recreation Center Expansion, and the new campus in Mission Valley, we hope this Project is equally environmentally friendly.

As stated in the Notice of Preparation: "There are two components to the Proposed Project, the Peninsula Component located adjacent to the main SDSU campus at the northern terminus of 55th Street, and the University Towers East Component located south of Montezuma Road, east and immediately adjacent to the existing University Towers building on the main SDSU campus. Development of the Peninsula Component would include the phased development of one (1) 9-story and five (5) up to 13-story student housing buildings that would contain a total of approximately 4,500 student beds. The proposed University Towers East Component would include a new 9-story student-housing building that would accommodate approximately 720 beds. In total, development of the Proposed

Project would result in 5,220 student beds (a net increase of approximately 4,500 new student beds) to the main campus inventory.”

The notice of preparation goes on to state that the Project will “include demolition of all 13 existing onsite buildings, which would include removal of 702 beds and 315 parking spaces, and the phased development of one 9-story building and five buildings up to 13-stories that would contain a total of approximately 4,500 beds to house university students.”

Additionally, the “0.71-acre site located on Montezuma Road currently utilized as a parking lot at 5505 Montezuma Road (See Figure 2, Vicinity Map.). The existing parking lot would be demolished to allow for redevelopment of the site to include a new 9-story student-housing building that would accommodate approximately 720 beds.”

Sierra Club looks forward to a DEIR which covers the following environmental issues.

### **Aesthetics**

Sierra Club has no great concern regarding the aesthetics of the project. Design should be consistent with other buildings on campus. The Notice of Preparation says that aesthetics could be significant. High rise buildings would be visible from Interstate 8 and from across the freeway but this is consistent with other multi-story buildings on campus and expected for major urban university.

Given that many of the buildings that will be demolished for this project are dilapidated, the project has the potential to improve the aesthetics of the campus.

Landscaping would be consistent with what is used on the existing campus.

### **Air Quality**

Given the proximity to the trolley and given the Project will reduce the need to drive to campus, we anticipate that there would be a significant improvement in air quality and corresponding transportation-based GHG. Nonetheless, Sierra Club looks forward to complete analyses of air quality. As stated in the Notice of Preparation: “it is anticipated that vehicle trips to and from student residences

would decrease because of the increased number of students who would now live within walking distance of their classes, thus eliminating the need for a vehicle. Analysis of the Proposed Project's potential air quality impacts and related mitigation measures will be provided in the Draft EIR."

During construction the Project should require as many construction vehicles as possible should be electric vehicles. Demolished building materials should be recycled to the extent possible as SDSU has done on several recent developments. Construction workers should be repeatedly reminded that SDSU is a nonsmoking campus and workers should abide by that requirement. Likewise, appropriate measures to reduce fugitive dust and airborne toxic fumes should be addressed. Special attention should be paid to the demolition of decades-old buildings that may contain asbestos and other toxic materials.

### **Biological Resources**

In the past, Sierra Club San Diego has opposed the expansion of SDSU dormitories into the open space and MSCP lands surrounding the developed campus. We are gratified that SDSU agreed and refrained from new development on surrounding sensitive open space.

It appears that the current Project would be constructed on previously developed land. The EIR should contain measures to prevent damage to or encroachment upon adjacent sensitive land. The EIR should assess the impact on wildlife and vegetation in the surrounding MSCP area.

Landscaping should attempt to plant native plants to the degree possible.

### **Energy**

Sierra Club advocates that the University shall install high-efficiency heat pumps for all end uses (including space heating, water heating, and clothes drying) in each building that comply, at a minimum, with the 2022 BEE Standards.

Sierra Club recommends that solar panels be installed on the new building with the goal of being a net zero energy project. Mitigation for excess energy use should occur on other parts of the campus with increased installation of solar panels or windmills.

All building energy efficiency standards for residential and nonresidential buildings should be compliant with 2022, title 24 building standards.

During construction the developer should use electric construction vehicles (e.g. front loaders, trucks, bulldozers etc.

No fossil fuels should be used to provide energy. The Sierra Club is concerned that gas connections are mentioned in the Notice of Preparation which we strongly oppose.

Indoor residential appliances and lighting will meet the requirements of Title 24 at the time of construction, which is assumed to be EnergyStar.

### **Greenhouse Gas (GHG) Emissions**

Sierra Club respectfully requests that a full analysis of the GHG emissions for the evolve project be conducted including.

1. All of the cumulative GHG generated during construction include all types of construction vehicles as well as the VMT of construction workers to and from the site.
2. The total GHG over the next 50 years during operation of the dormitories in this project.
3. The GHG reductions that will accrue from students living in the new dormitories on campus rather than driving to campus for classes, recreation, sporting events and lectures.

After a comprehensive GHG inventory is completed, the EIR should discuss a plan to mitigate excessive GHG on the project site or on the existing campuses. We recommend solar arrays be constructed on the roofs of all buildings and parking lots. Given that these are high rise dormitories, other mitigation measures across the campus should be proposed to mitigate the excess GHG.

Sierra Club is very concerned that natural gas is mentioned in the notice of preparation. Natural gas produces large amounts of GHG and should not be permitted in any State buildings. Moreover, it is expensive to plumb dormitories for natural gas and unnecessary since electricity is already available. Sierra Club

strongly urges that the Project be free of natural gas and **that** electronic heat pumps will be utilized for heating of air and water and cooling of the buildings.

### **Hazards/Hazardous materials**

Sierra Club recommends that the EIR prohibit the use of pesticides and herbicides in and around the dormitory buildings.

During demolition of the existing buildings special attention should be given to the presence of toxic chemicals (e.g. asbestos, lead paint, etc.) and a plan for the removal of such materials be articulated.

As with the SDSU Mission Valley Project and with the Conrad Prebys Union, all materials should be recycled and/or used in the new construction.

Sierra Club is gratified that the EIR will discuss evacuation plans for the new dormitories from natural threats from wildfire, flood, or earthquake.

### **Hydrology/Water quality**

As noted in the EIR there is minimal chances of major flooding since the Project is located on a mesa high Interstate 8 and Mission Valley. As the Notice of Preparation states there is little chance of a Tsunami or Seiche affecting campus.

The EIR should address potential runoff and erosion in the surrounding open space adjacent to and below the project. Appropriate swales, gutters, and sewers should be addressed in detail in the EIR.

### **Land use/Planning**

The Notice of Preparation notes that because this is a State of California Project it is not subject to local MSCP plans. However, Sierra Club is gratified that the Project will still do the analysis of the MSCP and surrounding land use.

### **Noise**

The Notice of Preparation notes that: "Potential increases in existing noise levels would be associated with certain aspects of the Proposed Project, including the introduction of a greater number of student residents at the Peninsula

Component site and introduction of student housing buildings into an area currently used as a parking lot at the University Towers East Component site.”

Sierra Club respectfully request that the EIR do noise analysis, provide noise reduction measures, and recommend mitigation for increased noise as a result to the project.

### **Population/Housing,**

From a housing standpoint Sierra Club is very supportive of the project. The project will help with the housing crunch in San Diego by moving approximately 5,000 students to campus that would have lived in the college area and/or throughout San Diego County. This is a meaningful increase in the housing inventory for San Diego County!

We are glad that the EIR will provide an analysis of the impact. “Potential impacts regarding population and housing will be addressed further in the Draft EIR. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR.”

### **Public Services**

The Sierra Club is satisfied with the promised analysis in the EIR that: “While most university-related public services are provided by SDSU itself, a discussion of the proposed Project’s impact on existing police, fire, school, parks, and library facilities will be included in the Draft EIR.”

### **Recreation**

The Notice of Preparation notes that: “Existing athletic, recreational, and open space areas are provided on campus for use by students and the campus community.” It further notes that: “Resident students are not expected to use non-SDSU parks and recreation facilities while living at the new student housing sites beyond levels that on-campus community members currently use these off-campus facilities.”

Indeed, it may lessen demand for off-campus recreation since nearly 5,000 additional students will now be recreating primarily on campus.

### **Transportation**

Sierra Club appreciates that no student parking will be provided for the dormitories. Instead, transportation will be provided by the Trolley, other transit, and existing parking places on campus.

The Notice of Preparation states that: "A transportation impact analysis will be prepared for the Proposed Project in conjunction with the Draft EIR." The EIR should address if resident students are entitled to a parking space on campus or if these are reserved for off-campus students, staff, and faculty.

Sierra Club believes that this project will be beneficial city transportation since nearly 5,000 students would live within walking-distance from classes and laboratories eliminating the need to commute from off campus. Sierra Club believes that this is an ideal form of infill where residents live close to schools, jobs, transit, and recreational opportunities.

### **Utilities/Service Systems,**

The Notice of Preparation states: "New facilities proposed in connection with the Proposed Project will necessitate public utilities, such as electricity, natural gas, communication systems, water, sewer, and stormwater drainage. Electric, heating, and air conditioning demands for the Proposed Project and potential capacity expansion and associated environmental impacts related to these utility demands will be analyzed in the Draft EIR. If applicable, mitigation measures to reduce or avoid potentially significant impacts would be identified in the Draft EIR." Sierra Club looks forward to these analyses.

The dormitories in the proposed project should not be plumbed for natural gas!! The State of California is strongly discouraging the use of natural gas and may ban it altogether before construction is underway on this Project. Natural gas is a fire hazard, produces toxic indoor air pollution, produces substantial climate warming greenhouse gas and results in greater costs for installation. Electric connection will be in the new dormitories and should be used for electric heat pumps to power hot water, heating, and air conditioning.

### **Wildfire.**

"Due to the adjacency with the undeveloped canyon and hillside areas, all landscaping for the Peninsula Component would be focused on drought-tolerant, low-flammability vegetation. "

Make sure that there are barriers to preclude trails and footpaths into the greenbelt and coastal sage scrub that could promote fire ignition from trespassing into the open space. The Sierra club concurs with that the statement in the Notice of Preparation that “The new student housing would be fenced to protect against unauthorized access from the surrounding community, and a gate would control access into the Peninsula Component once development is complete.”

Obviously, the EIR should address the use of inflammable building materials, indoor and outdoor sprinklers, evacuation procedures, and fire department access.

In conclusion, the Sierra Club is supportive of the Evolve Project and looks forward to the details of the EIR.

Sincerely Yours

Dr. Peter Andersen, Vice-Chair  
Conservation Committee  
Sierra Club San Diego



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**From:** evolvecomments@sdsu.edu on behalf of Nicole <nicole.yantos@gmail.com>  
**Sent:** Tuesday, September 24, 2024 9:06 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** Evolve Student Housing Comments

To Whom It May Concern,

Please address the following:

- \* There are no plans for additional parking. Where will the additional students park?
- \* Will construction vehicles be routed through the College View Estates neighborhood?
- \* Where will the construction workers park their personal vehicles?
- \* How will the Uber/Lyft/rideshare traffic be handled with the increased student population? Despite there being designated drop off/pick up areas on Remington Road, rideshare vehicles often block traffic and/or illegally park along red curbs.
- \* There is a crosswalk at Remington Road and 55th Street, but students regularly disobey the light signals and cross the street when it is not their signaled turn and/or without looking. I have seen a student hit by a car at this intersection as they crossed on a red hand signal. How will this intersection handle thousands of more students?
- \* Why isn't the SDSU West Campus being utilized for additional students? Per the SDSU Mission Valley Implementation Plan, how many residential buildings will meet the 265-foot height requirement at the SDSU West Campus?
- \* Will SDSU analyze the potential decrease in home value for certain residents in the College View Estates neighborhood? There are many homeowners that will lose their entire view of the East and Eastern mountain ranges to be replaced with high rise buildings.
- \* Many homeowners will lose privacy in their own homes and backyards. How will SDSU address this?
- \* How will the buildings impact the microclimate in the surrounding neighborhoods?
- \* What type of windows will be utilized for the buildings? Certain windows could cause reflective issues from the sun to the homes in the neighborhoods. Will this be assessed?
- \* How will the noise be mitigated?
- \* Will the buildings have balconies?
- \* There is already illegal dumping of trash and litter in the canyons along 55th Street by students. For example, I've seen couches, chairs, and trash dumped by students. How will SDSU address this?
- \* How will the demolition of the existing buildings be handled? Specifically, the toxic dust and air quality that could impact residents in College View Estates and other neighborhoods.
- \* How will emergencies be handled (particularly wildfires)? There are only two exit routes from the College View Estates neighborhood. If there are thousands more students, this will greatly impact the College View Estates residents' evacuation routes. How will College View Estates residents and students be evacuated in an emergency?
- \* How much will SDSU charge students for the housing?
- \* On the Evolve Student Housing website FAQ: "Why does SDSU plan to build additional student housing?" Answer: "For years, increasing numbers of junior, senior, and graduate students have indicated to SDSU that they would prefer to live on campus, and housing access is an important determinant of college choice. The project is not, however, designed to drive student enrollment, but to meet the existing and projected demand of students for the coming years." Another FAQ: "Will priority be given to certain students, such as freshmen or upperclassmen?" Answer: "Priority will be given to the first-year and sophomore students who live outside of the local service area and are required to live on campus. Local first-year students will be the next group to be accommodated. Next will be transfer students. All other

students will be accommodated as space is available.” These statements contradict one another. If the reason for additional housing is due to junior, senior, and graduate students’ preference to live on campus then this housing doesn’t meet that demand as priority will be given to other students first and will only be available to them as space is available. Please explain.

\* Please consider lower story buildings along the 55th Street Peninsula and only build as high as the existing apartments.

Thank you,  
Nicole and William Snyder

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**From:** María Luisa Zúñiga <mlzuniga@sdsu.edu>  
**Sent:** Monday, September 9, 2024 4:25 PM  
**To:** evolvecomments@sdsu.edu  
**Subject:** suggestion for housing

Hello Colleagues, excited to hear about much needed housing for our students and graduate students. Please consider having a wing or portion of housing to support students in recovery from substances/alcohol and those who prefer not to consume. this can help create a supportive community. thank you,  
Mari

María Luisa "Mari" Zúñiga, PhD ~ Pronouns: she/ella/ela Professor Co-Director, SDSU-UCSD Joint Doctoral Program in Interdisciplinary Research on Substance Use <https://chhs.sdsu.edu/irsu/>

School of Social Work, College of Health and Human Services ~~~~~

Co-Director, SDSU FUERTE, Faculty Unified Towards Excellence in Research and Transformational Engagement (FUERTE) <https://fuerte.sdsu.edu/> Co-Director, Faculty Development Program "Addiction Scientists Strengthened through Education and Training" (ASSET) San Diego State University

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ROD CLAY  
5441 HEWLETT DR.  
SAN DIEGO, CA.  
92115

SAN DIEGO CA 920  
21 SEP 2024 PM 2 L

Thinking  
Station



AD 130

KARA PETERSON, DIR OF PLANNING  
5050 PDC  
5500 CAMPANILE DR.  
SAN DIEGO, CA. 92182-1624

92182-000100



Kara Peterson, Director of Planning  
SDSU PDC  
5500 Campanile Drive  
San Diego, CA 92182-1624

## Evolve Student Housing Project Public Scoping Meeting Comment Card

All comments during the scoping period must be received in writing.

**Please turn in this comment card at tonight's meeting,**

Or via US Mail by the end of the scoping period (September 25, 2024).

Comments can also be received via email at [evolvecomments@sdsu.edu](mailto:evolvecomments@sdsu.edu).

Name: ROD CLAY Date: 9-21-24

Agency/Affiliation: NEIGHBOR SINCE 1957, AZTEC FOR LIFE

Comment: MY CONCERNS ARE FIRES, LOSS OF VIEW INCLUDING  
SUN & MOON RISES, HARDY TOWER, "S" MOUNTAIN, THUNDER  
CLOUDS FORMING. ACOUSTICS - WILL THE ECHOS AMPLIFY  
THE FREEWAY & HELICOPTER NOISES? WILL THE BUILDINGS  
CHANGE THE WIND PATTERNS? WILL I STILL BE ABLE TO  
HEAR THE CHIMES FROM HARDY TOWER? WILL THE LOSS  
OF SUN LIGHT DECREASE MY SOLAR POWER PRODUCTION?  
THE SEWER IN THE CANYON CURRENTLY LEAKS SEWAGE  
AT THE MAN HOLE COVER. WILL THE EXTRA CARS CAUSE  
MORE TRAFFIC ON 55TH ST. & COLLEGE GARDENS CT.?  
CAN WE ABIDE BY THE CURRENT RESIDENTIAL ZONE  
HIEGHT LIMIT?

ROD CLAY

5441 HEWLETT DR

SAN DIEGO, CA, 92115

619 788 2985



Kara Peterson, Director of Planning  
SDSU PDC  
5500 Campanile Drive  
San Diego, CA 92182-1624

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Name: Wesley L. Cooksey Date: 9/4/2024

Agency/Affiliation: SDSU Associated Students - Green Love

Comment: I would encourage traffic circles on 55th Street to calm traffic.

\* In-House Bike Storage room, w/ skateboard storage as well

\* As it is located on a hill, please ~~think~~ evaluate mitigation and evacuation strategies in the event of wildfire (either on the hillside or nearby)

~~\*\*\*\*\*~~

\* Aim to have all buildings in the development ~~try~~ go above LEED Gold (it doesn't need to be that at start, but please consider updating the development to reach above LEED Silver

\* Have a Red & Black Shuttle stop, with room for an MTS Access shuttle stop too (ADA matter)

Kara Peterson, Director of Planning  
SDSU PDC  
5500 Campanile Drive  
San Diego, CA 92182-1624

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Name: Jen Cottrell Date: Sept 4, 2024

Agency/Affiliation: Community

Comment: \_\_\_\_\_

Huge concern over evacuation plans  
we're already "stuck" w. just 2 ways  
in/out -> can they park in garages  
which are already full at peak hours

3) Big concern that construction  
starts same month as EIR -  
when is mitigation going to  
happen?



Kara Peterson, Director of Planning  
SDSU PDC  
5500 Campanile Drive  
San Diego, CA 92182-1624

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Name: Karen Jorgensen Date: 9/4/2024

Agency/Affiliation: College View Estates Assoc.

Comment: \_\_\_\_\_

- 1) How many parking spaces are in parking lot 12 ~~is~~ now?
- 2) Can you have all construction vehicles stay out of the residential neighborhood. College View Estates west of campus. That ~~is~~ last project all the large trucks came through the neighborhood. Our streets are too narrow for this.
- 3) Parking ~~is~~ traffic impacts to CVEA ~~is~~ the college area.
- 4) I do not think parking structure 12 can handle 4,000 more cars. <sup>plus parking</sup> for Aztec Basketball.
- 5) Can you build in Mission Valley & the students can trolley to campus?  
You received all that land to supersize your campus.
- 6) Fire evacuation plan with CEVA ~~is~~ your proposed project? ~~the~~ surrounding streets are packed now.



- 7) EXPAND PARKING PERMIT 'B' IN CEVA  
We are so impacted currently with students parking in our neighborhood due to no parking on campus. Maybe they live in the freshman dorm & no cars are allowed, they ditch them in our neighborhood until the weekend. Our streets are too narrow for this.
- 8) Noise & quality of life impact to houses across the canyon. Loss of value to single family housing nearby.
- 9) Please consider being a good neighbor to college view estates (west of the tennis courts).
- 10) How is the infrastructure going to be upgraded?

Kara Peterson, Director of Planning  
SDSU PDC  
5500 Campanile Drive  
San Diego, CA 92182-1624

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Name: Maximilian Ludens Date: 9-03-2024

Agency/Affiliation: Student

Comment: I had questions<sup>concerns</sup> about the size of the building,  
If it is projected to have 9-ish floors, will there be additional  
elevator access to accommodate the volume and waits from  
floor 9-2. Another concern was for students with disabilities,  
and if they will have proper "priorities" on 1-2 floors or  
lower floors in general. As a resident at south campus  
place some accommodations that would be helpful and useful  
for a new residential location would be easier access out  
of the building from the sides of the building for higher  
floors, as it could be dangerous in an emergency.





Kara Peterson, Director of Planning  
SDSU PDC  
5500 Campanile Drive  
San Diego, CA 92182-1624

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Name: Brandon Reynolds Date: 9/14/24

Agency/Affiliation: SDSU

Comment: Consider the parking lot that's above the  
trolley tunnel as well as building next to the area that  
the tunnel is under.

• Build roundabouts at the intersections for greater safety  
for pedestrians

• Reduce the lanes from 4 to 2 on SStn to make space  
for biking, vegetation, and walking

• Install rain water harvesting to collect the rain for use,  
use sustainable material such as bamboo or hemp?

Kara Peterson, Director of Planning  
SDSU PDC  
5500 Campanile Drive  
San Diego, CA 92182-1624

## Evolve Student Housing Project Public Scoping Meeting Comment Card

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Name: TOM SILVA [(619)261-8233] Date: SEPT. 4, 2024  
(thomasjerome.ts@gmail.com)

Agency/Affiliation: Chairperson: College AREA COMMUNITY PLANNING BOARD

Comment: #1.) THE EIR SHOULD describe, in detail, the EMERGENCY  
Evacuation Plan For both sites.

- How will THE students in THE Peninsula site HAVE  
SAFE EFFECTIVE EVACUATION Routes?

- SHELTER in PLACE SHOULD NOT be AN OPTION

#2.) WHAT ARE THE RENTS FOR THE BEDS?

How Do THESE RENTS Compare to Non-Student Housing RENTS  
in THE College Area; Rolando Community; El Cerrito Community  
AN City HEIGHTS?

#3.) WHAT is THE PARKING PLANS FOR EACH SITE?

- PLEASE Provide some on-site parking ~~options~~ OPTIONS.

#4.) PLEASE improve the Pedestrian & Bike Lane on Montezuma Road between  
54<sup>th</sup> Street & 55<sup>th</sup> Street

Kara Peterson, Director of Planning  
SDSU PDC  
5500 Campanile Drive  
San Diego, CA 92182-1624

## Evolve Student Housing Project Public Scoping Meeting Comment Card

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Name: Tom Silva Date: 9/4/2024

Agency/Affiliation: College AREA Community Planning Board

Comment: PLEASE include Base Line Housing (student Housing) DATA  
in the report on the SDSU Campus.

For Example:

A.) How much student Housing is on SDSU?

B.) How much student Housing is within THE College Area

C.) WHAT ARE THE RENTS w/in THE Community

& How will it Compare to THE RENTS  
Expected For EVOLVE?

D.) PLEASE DEMONSTRATE THE NEED FOR THIS  
project.