

Mark Nelson  
5417 Hewlett Drive  
San Diego, CA 92115  
[menelson@gmail.com](mailto:menelson@gmail.com)

April 3, 2017

Honorable Edmund G. Brown Jr.  
c/o State Capitol, Suite 1173  
Sacramento, CA 95814

SUBJECT: San Diego State University Proposed Canyon Destruction

Dear Governor Brown:

As the most committed ally of the environment in California and a member of the CSU Board of Trustees, I ask for your intervention with San Diego State University to stop them from destroying a pristine, environmentally sensitive canyon to build dormitories.

Specifically, please contact:

Robert Schulz, SDSU Associate VP of Real Estate  
[rschulz@mail.sdsu.edu](mailto:rschulz@mail.sdsu.edu), 619-594-5224

Laura V. Shinn, SDSU Director of Planning  
[lshinn@mail.sdsu.edu](mailto:lshinn@mail.sdsu.edu), 619-551-8897

and *direct them to include a CEQA analysis of placing the maximum feasible amount of students in the ALREADY DISTURBED SDSU dormitory land referred to as Phase 1.* SDSU's current plan will REQUIRE destruction of a pristine, environmentally sensitive canyon in Phases 2 and 3 with NO options to FULLY utilize the existing disturbed land in Phase 1.

SDSU has lost its way both environmentally and ethically as they ignore the local community and environmentalists asking them to build on already disturbed land and away from existing residential neighborhoods. In addition, SDSU staff is preparing a Machiavellian CEQA analysis and EIR that deliberately forces the CSU Trustees to certify the destruction of the canyon in order to preserve SDSU's preferred construction schedule.

The map below from an SDSU presentation shows the 3 Phases of the project. Phase 1 is on disturbed land (a parking lot) toward the interior of the campus and is only 4-6 stories tall. It sits next to an 11 story existing dorm that is the tallest structure on the SDSU campus. Phases 2 and 3 are both proposed to be built by destroying the canyon and will be 11-14 stories tall, or

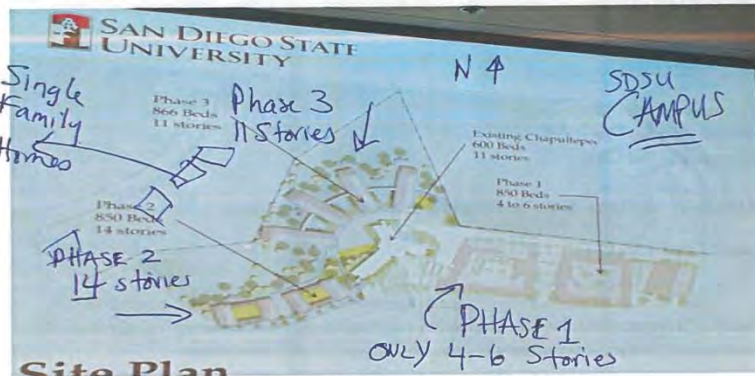
I1-1

I1-2

I1-3

## Responses to Comments – Individuals

nearly 10-15 times the height of the single family properties at their adjoining lot lines to the west.



I1-3  
Cont.

SDSU staff has chosen to proceed with a significant under build of the already disturbed, on-campus Phase 1 area (and other nearby areas that could be utilized). As a result, SDSU's preferred plan FORCES the CSU Trustees to certify the Phase 1 – 3 plan EIR that destroys the canyon in order to maintain schedule. Because SDSU staff is not providing the option to place 14 story buildings instead of 4-6 story buildings in Phase 1, the Trustees will NOT have the ability to certify an EIR that PRESERVES the environmentally sensitive canyon, STOPS 14 story buildings immediately adjacent to private homes, and preserve their construction schedule.

I1-4

No SDSU preferred plan should destroy a pristine, environmentally sensitive canyon in the name of campus expansion. This is no different than President Trump promoting coal for economic expansion and ignoring the associated environmental impacts. SDSU should NOT be acting like the Trump Administration.

I1-5

Thank you for your past and future environmental stewardship and action on this SDSU issue.

Sincerely,

Mark Nelson  
Member - Sierra Club, EDF, NRDC, Nature Conservancy

Xc:

RECEIVED

APR 10 2017

**Response to Comment Letter I1**

**Mark Nelson**

**April 3, 2017**

- I1-1** The comment refers to the project's potential impacts to the canyon that would result with implementation of Phases II and III and requests consideration of a Phase I only project. Following submittal of the comment, and based on input received from public agencies and the community, the proposed project was modified to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications.
- I1-2** The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I1-3** The comment restates information contained in the Draft EIR and does not raise an environmental issue required to be addressed under CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I1-4** The comment generally addresses the three-phase project analyzed in the Draft EIR. With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, as noted above, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I1-5** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the draft EIR. For that reason, no further response to this comment is required.

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## Responses to Comments – Individuals

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### Comment Letter I2

**Subject:** Request for meeting in district office on SDSU Earth Day announcement of canyon destruction

**Date:** Sat, 22 Apr 2017 11:04:32 -0700

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>

**To:** [Rendon.Scheduling@asm.ca.gov](mailto:Rendon.Scheduling@asm.ca.gov)

**CC:** [presidents.office@sdsu.edu](mailto:presidents.office@sdsu.edu), [tmccarron@mail.sdsu.edu](mailto:tmccarron@mail.sdsu.edu)

Dear Speaker Rendon:

SDSU celebrated Earth Day 2017 by announcing their dorm project that will destroy a pristine canyon - instead of building the dorms on the campus. It's a cruel irony that SDSU is so tone deaf to the community input and the environment. Their CEQA DEIR is posted.

I2-1

As a member of the CSU Trustees, and as an environmental advocate, I seek to have a briefing with you to demonstrate options and ask for your intervention. California didn't pass CEQA and SB350 and other important environmental leadership legislation to have a state institution act with level of environmental disregard. That's not who we are.

I2-2

SDSU rejected all community input and chose to put 4 story buildings on a parking lot inside the campus, and 11-14 story buildings in the pristine canyon. Had they only examined a CEQA alternative with 14 story dorms on the parking lots, at least 50% of the canyon construction could be avoided. However, in an effort to provide the Trustees with a "poison pill", they elected to only provide alternatives that fail so that the Trustees will be required to certify this environmental disaster to maintain schedule.

I2-3

Rather than proceed to litigation, which is the path we are headed, I believe that community input can help craft a solution.

I2-4

My Los Angeles office is about 20 minutes from your district office and I ask for a meeting. Thank you.

I2-5

Mark Nelson

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## **Response to Comment Letter I2**

**Mark Nelson**

**April 22, 2017**

- I2-1** The comment refers to Earth Day and the commentator's opinion regarding the proposed project. The comment is an introduction to comments that follow and expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I2-2** The comment seeks a meeting with Assembly Speaker Rendon regarding the proposed project. The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I2-3** The comment regards the location of the proposed project. With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I2-4** The comment refers to community input and serves as a further support for the meeting request. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I2-5** The comment reiterates the request for a meeting. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

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## Responses to Comments – Individuals

### Comment Letter I3

On Mon, May 1, 2017 at 3:53 PM, Vi Calvo <[vcalvo1228@gmail.com](mailto:vcalvo1228@gmail.com)> wrote:

Dear Laura Shinn,

I do not support the current plan of the SDSU New Student Housing based on the DEIR documents. I am primarily concerned about:

I 13-1

1. The increased traffic. Based on the DEIR in Chapter 2, some of the increased traffic will be mitigated by repainting lanes at the 55th/Montezuma and College/Montezuma intersections. However, traffic along Montezuma will only get worse as the report noted since Montezuma cannot be expanded; **this is not acceptable and should prompt SDSU to consider other locations and/or reduce the dorm size.** In addition, the report failed to consider how traffic will be affected west of the proposed dorms where many drivers use Remington to Hewlett to College Gardens to Yerba Anita/Santa to reach Montezuma. As a resident, I have noticed considerably more drivers on these streets when SDSU is in session than not in session. If all 4,000+ beds are added, I strongly doubt that only 2% of traffic will go through the neighborhood; it would be more especially if Montezuma can't be widened.
2. Aesthetic - Replacing the canyon area with 14 story dorms is out of place with the existing Chapultepec Dorms and mostly single story homes in CVEA. The DEIR states that the dorms would create a significant and unavoidable impact in terms of cumulative aesthetic and/or lighting impact. This is not acceptable.

I 13-2

I 13-3

I 13-4

Though I am supportive of more student housing, I am most against the number of new beds sought and the resulting height of proposed buildings. If it had reduced floors, I would be more supportive of the dorm in phase 1 on Lot 9. As the plans stand for phases 2 and 3, I am very against their development unless drastic changes are made.

I 13-5

Thank you for the opportunity to share my comments about the SDSU New Student Housing.

I 13-6

Best,

Vi Calvo

Resident on College Gardens Court

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**Response to Comment Letter I3**

**Vi Calvo**  
**May 1, 2017**

- I3-1** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I3-2** The comment restates information contained in Chapter 2, Project Description and Section 4.14, Transportation/Circulation and Parking of the Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I3-3** The comment states that the EIR failed to consider traffic heading west on Remington Road, through the College View Estates area. The comment is incorrect. The geographic distribution of vehicle trips generated by the proposed project was determined using the SANDAG travel demand model. The model is a computerized travel demand model that utilizes a sophisticated trip distribution function to derive the distribution of vehicle trips. Based on the SANDAG model, the traffic engineer determined that two percent of Project traffic would access the Project site from the west, through the College View Estates area; thus, traffic through the College View Estates area was considered as part of the analysis. The Project traffic distribution, as derived through the SANDAG traffic model, is illustrated on Draft EIR Figure 4.14-3, Project Traffic Distribution, and Final EIR revised pages, Appendix K, Figure 8-1. (See also Draft EIR p. 4.14-7, and Appendix K, Sections 3.0 and 8.2.) While the commentator may notice “considerably more drivers on these streets” when SDSU is in session, that does not necessarily mean the two percent SANDAG distribution forecast is incorrect. For additional information responsive to this comment, please also see the responses to comments O-6-29 through O-6-32.
- I3-4** The commenter raises concerns regarding the proposed Phase II building and the existing character of the primarily single-story residential College View Estates Area. The commenter also acknowledges that the Draft EIR significance conclusion regarding introduction of the Phase II building to the area. Phases II and III have been removed as part of the Project; therefore, any concerns regarding these phases of the Project are no longer relevant. For that reason, no further response to this comment is provided.

## **Responses to Comments – Individuals**

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- I3-5**      The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I3-6**      The comment is a conclusion to previous comments. No further response is required.

## Responses to Comments – Individuals

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### Comment Letter I4

From: Charles Sloan <[chuksln@aol.com](mailto:chuksln@aol.com)>  
Date: Wed, May 3, 2017 at 3:59 PM  
Subject: Aztec Canyon  
To: [ishinn@mail.sdsu.edu](mailto:ishinn@mail.sdsu.edu)

We have lived there since Hewlett Dr homes were brand new in 1958 and we love the open healthy canyon!

We purchased in good faith and consider the sensitive canyon medicinal and therapeutic!

Please consider another location for these dorms!

Thank you!

Paula Adler Sloan

Sent from my iPhone7

I 14-1  
I 14-2

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**Response to Comment Letter I4**

**Paula Adler Sloan**

**May 3, 2017**

- I4-1**      The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I4-2**      With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment raises an issue that was studied and evaluated in Chapter 6.0, Alternatives, of the Draft EIR. Alternatives to the Project location received extensive analysis in the Draft EIR. The Draft EIR assessed numerous alternative Project locations and eliminated them because they were infeasible, failed to meet the Project objectives, or failed to avoid or reduce significant impacts. Please see Alternatives Thematic Response for information responsive to the comment.

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## Responses to Comments – Individuals

### Comment Letter I5

From: "Bear Family" <[beardensd@cox.net](mailto:beardensd@cox.net)>

Date: May 2, 2017 at 8:52:22 PM PDT

To: <[Presidents.office@sdsu.edu](mailto:Presidents.office@sdsu.edu)>

Subject: Aztec Canyon

I love the university and am involved in various aspects of Aztec life. I sit on the advisory board for the School of Accountancy and have been involved in visiting classrooms to teach students and as well as providing tours and talks at my employer, Taylor Guitars, for SDSU-CIBER and EMBA programs.

I 15-1

I know that living next to SDSU has downsides. There will be growth, and managing increased density creates challenges in any urban environment. I want to see more student housing built on campus and support the objectives of the Sophomore Success Program.

I 15-2

SDSU has many planning options that can achieve all of the stated objectives for new student housing. By the university's own accounting, there are at least sixteen locations on the Montezuma Mesa campus that could be used for new dormitories. Of those, SDSU has estimated that at least seven would achieve all of the objectives for the Sophomore Success Program. And of those seven, all but one would not require any destructive impacts to rare and endangered environmental habitat.

I 15-3

SDSU, contrary to all logic, and contrary to the goals of the California Environmental Quality Act, has rejected all of the options except the single most environmentally damaging one.

I 15-4

This makes no sense.

The canyon ecosystem adjacent to the existing Chapultepec tower is not "vacant," waiting for development. It is home to up to 85 species of rare and endangered animals and plants, many of which flourish nowhere beyond the few remaining canyon habitats in San Diego. This canyon is an irreplaceable resource for the university, its students, and for future generations of Californians. It has great academic and educational value. By joint agreement between U.S. Fish and Wildlife, California Fish and Wildlife, and the City of San Diego, the canyon area that SDSU plans to destroy is to be protected from encroachment through its inclusion in the Multi-Species Conservation Plan.

I 15-5

Once SDSU destroys this canyon, it will be gone forever. It has been there since the California landscape was carved out over eons by ancient rivers and climate systems. Now SDSU will destroy it with bulldozers in one afternoon, filling it in to make room for new dormitories.

This is wrong.

I ask you to do the right thing for the students, the taxpayers, and the current and future citizens of California. Please find an alternative to the current plan.

I 15-6

Sincerely,

Bryan Bear  
BS Accounting '90  
EMBA '03

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### Response to Comment Letter I5

**Bryan Bear**

**May 2, 2017**

- I5-1** The comment is an introduction to comments that follow. No further response is required.
- I5-2** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I5-3** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I5-4** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I5-5** With respect to the comment regarding the canyon ecosystem, see Biological Resources Thematic Response, which states that Phases II and III will not be developed. Phases II and III included the direct impacts to the canyon. Phase I does not directly impact the canyon.
- I5-6** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close

## **Responses to Comments – Individuals**

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of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

## Responses to Comments – Individuals

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### Comment Letter I6

From: <[kerri@thedunne.com](mailto:kerri@thedunne.com)>  
Date: Thu, May 4, 2017 at 9:36 AM  
Subject: Do not destroy Aztec Canyon  
To: [Ishim@mail.sdsu.edu](mailto:Ishim@mail.sdsu.edu)

Laura,

We recognize and accept that being neighbors with a large urban campus has downsides. There will be growth, and managing increased density creates challenges in any urban environment.

I 16-1

We want to see more student housing built on campus. We support the objectives of the Sophomore Success Program.

I 16-2

SDSU has many planning options that can achieve all of the stated objectives for new student housing. By the university's own accounting, there are at least sixteen locations on the Montezuma Mesa campus that could be used for new dormitories. Of those, SDSU has estimated that at least seven would achieve all of the objectives for the Sophomore Success Program. **And of those seven, all but one would not require any destructive impacts to rare and endangered environmental habitat.**

I 16-3

SDSU, contrary to all logic, and contrary to the goals of the California Environmental Quality Act, has rejected all of the options except the single most environmentally damaging one. This makes no sense.

I 16-4

The canyon ecosystem adjacent to the existing Chapultepec tower is not "vacant," waiting for development. It is home to up to 85 species of rare and endangered animals and plants, many of which flourish nowhere beyond the few remaining canyon habitats in San Diego. This canyon is an irreplaceable resource for the university, its students, and for future generations of Californians. It has great academic and educational value. By joint agreement between U.S. Fish and Wildlife, California Fish and Wildlife, and the City of San Diego, the canyon area that SDSU plans to destroy is to be protected from encroachment through its inclusion in the Multi-Species Conservation Plan.

I 16-5

Once SDSU destroys this canyon, it will be gone forever. It has been there since the California landscape was carved out over eons by ancient rivers and climate systems. Now SDSU will destroy it with bulldozers in one afternoon, filling it in to make room for new dormitories. This is wrong.

I 16-6

Do the right thing and select another location.

I 16-6

Sincerely,  
Kerri Dunne  
Stone Court

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### Response to Comment Letter I6

**Kerri Dunne**

**May 4, 2017**

- I6-1** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I6-2** The comment is acknowledged and appreciated. The comment expresses general support for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I6-3** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I6-4** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I6-5** See response to comment I5-5.
- I6-6** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to

## **Responses to Comments – Individuals**

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public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

## Responses to Comments – Individuals

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### Comment Letter I7

From: <[jdunne@thedunne.com](mailto:jdunne@thedunne.com)>  
Date: Tue, May 2, 2017 at 10:26 AM  
Subject: Chapultepec Hall new development  
To: [Ishinn@mail.sdsu.edu](mailto:Ishinn@mail.sdsu.edu)

Ms Shinn,

I have just learned of the university's plan to development along the canyon and Remington Rd. Suffice to say this seems like a plan with ZERO regard for the residence of the area.

I 17-1

This is the main, way in and out of the neighborhood. The size, the congestion, and the look of the buildings...

I 17-2

I am curious how do you see this affecting our neighborhood? Do you see this as adding are reducing the quality? Seems pretty clear this will result in a complete choking of our neighborhood, investors flooding in and no more families..

I 17-3

Was any kind of study taken? did you take our neighborhood into account?

I 17-4

Joe Dunne  
5225 Stone CT..

Joe

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**Response to Comment Letter I7**

**Joe Dunne**

**May 2, 2017**

**I7-1** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I7-2** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The Project's impacts relative to the Remington Road were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I7-3** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The Project's impacts relative to the Project area were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft and Final EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

The aesthetics impacts of the Project (including effects to the existing visual quality and character of the site and surrounding area) are disclosed in Section 4.1, Aesthetics, of the Draft and Final EIR. The Draft EIR determined that impacts to existing visual character and quality associated with Portions of Phase II and all of Phase III development of the Project would be significant and unavoidable. However, since the Draft EIR was released for public review, Phases II and III have been eliminated from the Project. Please see Final EIR, Preface, for additional information regarding the project modifications. Therefore, there would be no significant and unavoidable impacts associated with visual character and quality associated with the Project.

**I7-4** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

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### Comment Letter I8

From: **Randi McKenzie** <[rmckenzi@mail.sdsu.edu](mailto:rmckenzi@mail.sdsu.edu)>  
Date: Mon, May 8, 2017 at 10:16 AM  
Subject: Residential Living Construction  
To: Laura Shinn <[lsinn@mail.sdsu.edu](mailto:lsinn@mail.sdsu.edu)>

Hi Laura,

I am writing to share my concerns about the location of the proposed construction of massive residence halls for SDSU students.

I8-1

As an employee of SDSU for over 36 years and a resident in the College View Estates neighborhood for over 25 years, I would like to suggest that instead of encroaching upon a tight knit and SDSU friendly community, that SDSU looks to build additional housing on 55th street.

I8-2

The very old and outdated 55th street apartments could easily be phased out over time and the high rise residence halls could be phased in. The location is closer to campus, away from the canyon and neighborhood, and the current 55th apartments certainly need upgrading. The number of students currently living there could be impacted gradually by removing one apartment at a time, building up a hall and then refilling it with students. Over time, the area can be greatly restored.

I8-3

Bringing university construction into the current canyon, destroys an environment we chose to live near. It would drastically lower the property values of those individuals living in College View Estates (Hewlett in particular), greatly increase traffic both vehicular and human and disrupt an environment we cherish.

I8-4

## Responses to Comments – Individuals

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While I support strongly students living on campus-- particularly local SDSU students, as we know from the research that on-campus students generally perform better academically, I can not support the location of the proposal as it currently is suggested.

Please reconsider the site on 55th Street as an alternative location.

Thank you,  
Randi

**Randi Elise McKenzie, M.Ed., Emeritus Assistant Dean**  
San Diego State University  
5500 Campanile Drive  
San Diego, CA 92182-8222

[rmckenzi@mail.sdsu.edu](mailto:rmckenzi@mail.sdsu.edu) phone: [619-594-6298](tel:619-594-6298)

18-5

## **Response to Comment Letter I8**

**Randi Elise McKenzie**

**May 8, 2017**

- I8-1** The comment is an introduction to comments that follow. No further response is required.
- I8-2** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I8-3** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I8-4** The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. Also, the comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I8-5** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the

## **Responses to Comments – Individuals**

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environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

### Comment Letter I9

From: **Thomas McKenzie** <[tmckenzi@mail.sdsu.edu](mailto:tmckenzi@mail.sdsu.edu)>  
Date: Mon, May 8, 2017 at 1:22 PM  
Subject: Re: Proposed Residential Living Construction--take two  
To: Laura Shinn <[lsinn@mail.sdsu.edu](mailto:lsinn@mail.sdsu.edu)>

**My earlier note is herein amended--I intended to refer to the West side of campus, not the Best side! Freud still runs amuck!**

I 19-1

On Mon, May 8, 2017 at 11:35 AM, Thomas McKenzie <[tmckenzi@mail.sdsu.edu](mailto:tmckenzi@mail.sdsu.edu)> wrote:  
Hi Laura,

I am writing to share my concerns about the proposed construction of the massive residence halls for SDSU students.

I joined the faculty at SDSU in 1980 and am still associated with the university as a researcher and revenue contributor to the campus.

I became a resident of the College View Estates in 1990, and will express only three of my primary concerns about the proposed development.

19-2

#### **1. Quality of life--especially for students.**

A 14-story building to store students? Are modern universities still building high rise dormitories?

If yes, it surely seems like the inner city construction of 'the projects' of the 60' and 70's---and what I currently see happening in China.

Whatever happened to the work of urbanists (e.g., Jane Jacobs) and the design of quality, livable communities?

19-3

### 2. Traffic.

I see no real traffic mitigation plans. Getting through campus by automobile is currently challenging enough, and it takes forever of a pedestrian to cross 55th street to the west side of campus. Are bridges (over 55th) or tunnels (under 55th) planned to both the flow of autos and pedestrians?

19-4

### 3. Can we trust SDSU plans.

When we purchased our College View Estates home in 1990 we were told that Chapultepec would be 8 stories high. Somehow by the time it was completed it was 37.5% taller and loomed over the neighborhood.

Are there any guarantees that the current proposed monstrosities won't get even longer, wider and taller?

19-5

Surely there are other firms that can come up with better housing designs for students! Please keep looking.

19-6

—  
Thomas L. McKenzie, PhD, FACSM, FNAK  
Investigator, Institute for Behavioral and Community Health (IBACH)  
Professor Emeritus, School of Exercise and Nutritional Sciences  
San Diego State University  
5127 Walsh Way, San Diego, CA 92115  
[619-339-9869](tel:619-339-9869)  
[tmckenzie@sdsu.edu](mailto:tmckenzie@sdsu.edu)  
REVISED Website: [thomckenzie.com](http://thomckenzie.com)

Make America **CIVIL** again!

**Response to Comment Letter I9**

**Thomas L. McKenzie**

**May 8, 2017**

- I9-1**      The comment is an introduction to comments that follow. No further response is required.
- I9-2**      The comment is an introduction to comments that follow. No further response is required.
- I9-3**      The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I9-4**      The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Proposed Project.
- I9-5**      The comment is acknowledged and appreciated. Following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As such, the proposed Project will no longer have significant unavoidable impacts, and all of the proposed Project's significant environmental impacts will be reduced to less than significant.
- I9-6**      The comment is acknowledged and appreciated. The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. The proposed project has been modified to eliminate Phases II and III such that the Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant. Please see Final EIR, Preface, for additional information regarding the project modifications. No further response is required because the comment does not raise an environmental issue.

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## Responses to Comments – Individuals

### Comment Letter I10

From: Susan Richardson <[dprsmr@gmail.com](mailto:dprsmr@gmail.com)>  
Date: Mon, May 8, 2017 at 10:31 AM  
Subject: Missing public input  
To: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), Gary Campbell <[cveapresident@gmail.com](mailto:cveapresident@gmail.com)>

Dear Ms. Shinn,

In reviewing the proposed dorm project website today, I noticed that a letter that I had submitted at the January 18, 2017 meeting was not included in the NOP public comments. I had prepared the letter addressed to you for the public comment period, however, there was no opportunity at that meeting, so I left the letter with the court reporter. I am quite disappointment that all public comment received was not posted or was possibly misplaced under your supervision.

It just continues to show how there is a disregard for any input other than the university's preconceived, ill-informed plans for this project.

I assume you will respond that this letter is too late for the NOP, even though I hand delivered it on January 18, so I will request that you submit it again as a response to the draft EIR, however, I will be preparing a more specific comment for the draft EIR before the end of the comment period.

Susan Richardson  
5433 Hewlett Dr  
San Diego, CA 92115

I10-1

I10-2

I10-3

ORIGINAL EMAIL 1/18/2017

Susan and Dino Richardson  
5433 Hewlett Drive  
San Diego, CA 92115  
[dprsmr@cox.net](mailto:dprsmr@cox.net)

Laura Shinn  
Director, Facilities Planning, Design and Construction  
San Diego State University  
San Diego, CA 92182-1624  
Subject: Notice of Preparation (NOP) of Environmental Impact Report-

Dear Ms. Shinn,

We are writing to you to provide input for consideration for the environmental impact report for the proposed dorms on Remington Road and 55<sup>th</sup> Street in the city of San Diego. My husband and I have lived at 5433 Hewlett Drive for over 22 years, directly across the canyon from the existing Chapultepec Dorm. We are Aztec alumni, basketball season ticket holders, members of

I10-4

## Responses to Comments – Individuals

the Aztec Recreation Center and regular patrons of the SDSU theater arts program. Within the College View Estates neighborhood, the residents on our side of the street will be the most affected by any new construction that is proposed.

↑ I10-4  
Cont.

Some of the many concerns we have include:

- 1) Impact to the City sewer system. Currently Chapultepec runs down Hewlett, an increase of students should require additional capacity.
- 2) Currently, there is little to no security for students who because of lack of smoking facilities at the existing dorm, loiter on Remington and Hewlett in front of homes smoking along the sidewalks and in their cars that are parked in the neighborhood. In addition, students are regularly IN THE CANYON behind the dorm smoking, causing a fire hazard.
- 3) The lack of proposed parking for cars will further increase the parking impact from the ARC, baseball, softball, tennis and Aquaplex users on the neighborhood streets.
- 4) The circulation along Remington to access College View Estates is already difficult when parents, deliveries and ride sharing services park in the bike lane and into the one lane of traffic on the city street. Increasing the number of cars and pedestrians along Remington is a safety concern.
- 5) The noise from the existing dorm, whose windows open towards our neighborhood, is often loud. This extends to summer when the dorm is used as rentals for youth camps.
- 6) There is often litter in the canyon behind Chapultepec that is not maintained. I have had frequent emails requesting to the SDSU grounds maintenance department and neighbors who dislike looking at it from across the canyon go over to pick it up. Increasing the population three fold will only increase the amount of litter.
- 7) Additionally, we are concerned for the loss of canyon habitat. There are often birds of prey, coyotes, bob cat and other wildlife spotted in the open space. Residents must observe a canyon review when making any renovations to their homes, the university should as well.
- 8) The access for fire vehicles to our neighborhood would be compromised by the increased traffic. It is recommended that if approved, SDSU be required to build a station on campus that would serve the neighboring community as well.

I10-5

I10-6

I10-7

I10-8

I10-9

I10-10

I10-11

I10-12

I10-13

I10-14

We are not opposed to the phase 1 of the project that was in the original master plan, however, are adamantly opposed to the addition of phase 2 and 3 which we believe is not good planning. We urge you to find alternate locations on campus owned property to house the additional students such as Alvarado Road, the redevelopment of 55<sup>th</sup> Street Albert's apartments, Adobe Falls Road or now put your sights on the Mission Valley Stadium location

I10-15

I10-16

Sincerely,

Susan and Dino Richardson

**Response to Comment Letter I10**

**Susan and Dino Richardson**

**May 8, 2017**

- I10-1** The comment is an introduction to comments that follow. No further response is required.
- I10-2** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I10-3** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I10-4** The comment is an introduction to comments that follow. No further response is required.
- I10-5** Thank you for the comment regarding sewer capacity in the Hewlett neighborhood west of the project site. The projected wastewater generation of the proposed project was calculated and analyzed in Section 4.13 Public Services and Utilities, of the Draft EIR starting on page 4.13-40. This analysis concluded that the Project's wastewater generation would not exceed the capacity of the existing sewer main located in Remington Road and the impact is less than significant.
- I10-6** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. Please note that the entire SDSU campus is non-smoking and enforces violations of this policy through ticketing and fines. Multiple offenses could result in eviction of on-campus housing. Smoking complaints should be directed to the University Police, who will contact the on-duty residence hall coordinator to address the issue. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I10-7** The potential for a cigarette or similar device causing a vegetation fire in Aztec Canyon is considered possible, but a low probability event. SDSU bans smoking on campus and the buildings that are adjacent to native vegetation will have permanently closed windows. The comment states that students currently leave campus to smoke. However, the comment does not provide substantiation that there have been fires linked to this activity. If students leave campus to smoke, there does not appear to be areas with access to Aztec Canyon that would result in ignitions.

## Responses to Comments – Individuals

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- I10-8** The comment addresses general subject areas, which received extensive analysis in the EIR. The Project's impacts relative to parking were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft and Final EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I10-9** The comment addresses general subject areas, which received extensive analysis in the EIR. The Project's impacts relative to Remington Road were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft and Final EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I10-10** The comment addresses general subject areas, which received extensive analysis in the EIR. The Project's impacts relative to Remington Road were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft and Final EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I10-11** The comment states that noise levels from the students at the existing dorm is often loud, and that this occurs year-round when the dorm is used for youth camps. Pursuant to the SDSU Code of Conduct, provided to all students who sign housing contracts, the dorms observe quiet hours from 9 p.m. to 10 a.m. Sunday through Thursday and from midnight to 10 a.m. Friday and Saturday. Noise complaints should be directed to the University Police, who will contact the on-duty residence hall coordinator to address the issue.
- I10-12** The comment is acknowledged and appreciated. The comment does not raise an environmental issue required to be analyzed under CEQA. The comment will be included as part of the record and made available to decision makers prior to the final decision on the Project. No further response is required because the comment does not raise any issue concerning the adequacy of the Draft EIR.
- I10-13** See response to comment I5-5.
- I10-14** The Project's Fire Hazards were analyzed in the Fire Fuel Load Modeling Report (Dudek 2017). Based on the results of that evaluation, fire safety measures were developed to protect the proposed structures from wildfire threats, enable fire department access, and provide a defensible project. The Canyon is considered to include the potential for wildfire and that potential has been addressed through project design features and measures above and beyond code requirements. Please also refer to response to comment I-17-30 for additional details on Project requirements for constructing in a VHFHSZ.

## Responses to Comments – Individuals

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- I10-15** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I10-16** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

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## Responses to Comments – Individuals

### Comment Letter I11

5/3/2017

San Diego State University Mail - SDSU housing



Laura Shinn <lshinn@mail.sdsu.edu>

#### SDSU housing

1 message

**Melville Willard** <mwillard@cox.net>

Tue, May 2, 2017 at 7:42 PM

To: lshinn@mail.sdsu.edu

I am strongly opposed to SDSU's proposal to build in the canyon. It is time to take care of our limited natural resources. Please include my name on the appropriate petition. Thank you.

Melville Willard

Sent from my iPhone

I 111-1

<https://mail.google.com/mail/u/0/?ui=2&ik=e0bd076579&view=pt&af=inbox%2FCapital%20Projects%2FNewStudentResidenceHall%2FDEIR%20Comments&as...> 1/1

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**Response to Comment Letter I11**

**Melville Willard**

**May 2, 2017**

- I11-1**      The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.

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## Responses to Comments – Individuals

### Comment Letter I12

9/29/2017

San Diego State University Mail - DEIR public meeting



Laura Shinn <lshinn@mail.sdsu.edu>

#### DEIR public meeting

1 message

GJ Fulton <gfultonlogistics@gmail.com>  
To: lshinn@mail.sdsu.edu

Wed, May 3, 2017 at 9:50 AM

Good morning,

As you may be aware, there is a strong outcry on several social media groups against the proposed dorms in the Canyon. I don't know if there will be a strong showing at the May 8th meeting, however, I would like additional information regarding the proposed development:

I12-1

According to the 2016 General Plan, this area is zoned SFR and open/recreational. Can you please advise what opinion you have from the City Planning Department in regard to the proposed development and whether the proposed development will require a zone change or C.U.P.?

I12-2

I would like to know what the proposed timeline is for bringing this before the Planning Commission.

I12-3

thanks,

Gabriela Fulton  
PO Box 231853  
Encinitas, CA 92023

(619)286-0029

*"If a problem is fixable, if a situation is such that you can do something about it, then there is no need to worry. If it's not fixable, then there is no help in worrying. There is no benefit in worrying whatsoever."*

*His Holiness, the 14th Dalai Lama*

Be Kind, Have Fun, Stay Warm

<https://mail.google.com/mail/u/0/?ui=2&ik=608d076578&view=ptical=info%2FCapital%20Project%2FNewStudentResidenceHall%2FDEIR%20Comments&as...> 1/1

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## **Response to Comment Letter I12**

**Gabriela Fulton**

**May 3, 2017**

- I12-1**      The comment is an introduction to comments that follow. No further response is required.
- I12-2**      The comment is acknowledged and appreciated. As a state agency, CSU/SDSU is not subject to local government planning, such as the City of San Diego General Plan. Accordingly, because such local land use plans are not applicable to CSU/SDSU, an analysis with respect to the General Plan's zoning and permits requirements is not required under CEQA. For that reason, no further response is required.
- I12-3**      The comment is acknowledged and appreciated. As a state agency, CSU/SDSU is not subject to local government planning, such as the City of San Diego General Plan. Accordingly, because such local land use plans are not applicable to CSU/SDSU, an analysis with respect to the General Plan's zoning and permits requirements is not required under CEQA. For that reason, no further response is required.

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### Comment Letter I13

5/8/2017

San Diego State University Mail - The canyon



Laura Shinn <lshinn@mail.sdsu.edu>

#### The canyon

1 message

Gary Hoover <thewideworld@mac.com>  
To: lshinn@mail.sdsu.edu

Mon, May 8, 2017 at 5:40 AM

Dear Ms. Shinn,

As a neighbor and supporter of the University, I am writing to vigorously object to your plans to place a student dormitory in what is known as Aztec Canyon. The canyon is a beautiful natural resource for the entire community and it would be a great pity to impinge upon it. Please select one of your alternative sites for this project.

I13-1

I13-2

I13-3

Gary Hoover  
5540 Dorothy Dr.  
San Diego, CA 95204

<https://mail.google.com/mail/u/0/?ui=2&ik=e0bd076579&view=pt&search=inbox&th=15be813766ea367&siml=15be813766ea367>

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## **Response to Comment Letter I13**

**Gary Hoover**

**May 8, 2017**

- I13-1** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I13-2** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I13-3** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

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## Responses to Comments – Individuals

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### Comment Letter I14

From: **Lisa Huth** <[ljham1955@me.com](mailto:ljham1955@me.com)>  
Date: Mon, May 8, 2017 at 4:22 PM  
Subject: Large dorm expansion  
To: [marcomm@mail.sdsu.edu](mailto:marcomm@mail.sdsu.edu)

I would like to know what gives SDSU the right to ruin are beautiful canyons. I have lived in the college area for 17 years . We have had to put up with parties, no parking in our neighborhoods. Large unwanted dorms that house more than 1 person per bedroom. Now you want to ruin our canyons and kill endangered animals and plants. I have heard form many neighbors that you have room to build.  
This tall downtown building on campus. Do the right thing and build it within your neighborhood not ours !  
Lisa  
Sent from my iPhone

I114-1  
I114-2  
I114-3  
I114-4

--  
Giselle Luevanos

Director of Digital Media  
San Diego State University  
Marketing and Communications

[619-594-1119](tel:619-594-1119) office  
[858-705-0512](tel:858-705-0512) mobile  
[gluevanos@mail.sdsu.edu](mailto:gluevanos@mail.sdsu.edu)  
Follow us on Twitter: [@SDSU](https://twitter.com/SDSU)  
Follow us on [Facebook](#)  
Follow us on [Instagram](#)

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**Response to Comment Letter I14**

**Lisa Huth  
May 8, 2017**

- I14-1** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I14-2** The comment expresses the opinions of the commentator and addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I14-3** See response to comment I5-5.
- I14-4** The comment expresses the opinions of the commentator and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. However, the comment references “tall downtown buildings on campus” in reference to Phases II and III. Following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

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## Responses to Comments – Individuals

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### Comment Letter I15

On Mon, May 15, 2017 at 10:06 AM, Susan Duerksen <[susand619@gmail.com](mailto:susand619@gmail.com)> wrote:  
Dear Ms. Shinn,

I am an SDSU alum (MPH, 2004) and a resident of San Diego's Kensington neighborhood for the past 21 years. Although I do not live adjacent to the SDSU campus, I am concerned about the environmental impacts of major construction projects such as the proposed housing near Chapultepec Hall.

I I15-1  
I I15-2

I understand that additional student housing is badly needed, but there has to be a way to achieve that without building in Aztec Canyon. The canyon must continue to be preserved as a natural open space, for conservation and the environmental health of all of us.

I I15-3  
I I15-4

Thank you.

Susan Duerksen  
5013 Westminster Ter.  
San Diego, CA 92116

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**Response to Comment Letter I15**

**Susan Duerksen**

**May 15, 2017**

- I15-1**      The comment is an introduction to comments that follow. No further response is required.
- I15-2**      The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I15-3**      The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the ~~draft environmental document~~EIR. For that reason, no further response to this comment is provided.
- I15-4**      The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.

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## Responses to Comments – Individuals

### Comment Letter I16

Donna J. Gans  
5086 College Gardens Court  
San Diego, California 92115  
May 12, 2017

Laura Shinn, Director  
Facilities Planning, Design & Construction  
SDSU  
550 Campanile Drive  
San Diego, CA 92182

Dear Ms. Shinn, and all others involved in the planning and design of the proposed new SDSU Student Housing Project.

Please Very Carefully Consider The Impact On Hewlett Drive and College Gardens Court.

Re: Draft EIR/New Student Housing

My daughter and my son-in-law, both school teachers, and my two-year-old granddaughter and four-year-old grandson - *as well as many other families* - will be experiencing the impact of the proposed new student housing project upon Hewlett Drive and College Gardens Court.

In this regard, I respectfully but strenuously submit to you that no reasonable person could doubt for a moment that Hewlett Drive and College Gardens Court may well become an often-used thoroughfare -- from Montezuma Drive to the new student housing project.

I likewise submit that with the volume of new personnel residing at the proposed site of the new project, the impact upon both residential streets -- each with scores of single-family residences, with families -- is likely to be significant on any day when SDSU is in session. Moreover, when there is an event at the Viejas Arena, or sports events on the athletic fields, or Homecoming, or move-in day or move out day, or Graduation Day, etc. etc. etc., the impact upon these two residential streets will be enormous.

Please see the attached map which should erase any possible lingering doubt that what I have stated above is accurate.\*

I am deeply concerned that the proposed new project jeopardizes the quality of life of my daughter, her husband, and my grandkids -- and I am scared to death of the danger posed by the increased volume of traffic running through their small residential street as a result of the proposed new project.

This is not right, nor equitable, nor in anyway reasonable or appropriate.

**Please consider very, very carefully the impact on the scores of families -- SDSU's neighbors -- who live on Hewlett Drive and College Gardens Court.**

*With the proposed massive new student housing project in mind, would you want your baby grandchildren living on Hewlett Drive or College Gardens Court?*

Most Sincerely,

Donna Gans

I16-1

I16-2

I16-3

I16-4

I16-5

I16-6

I16-7

I16-8

I16-9

I16-10

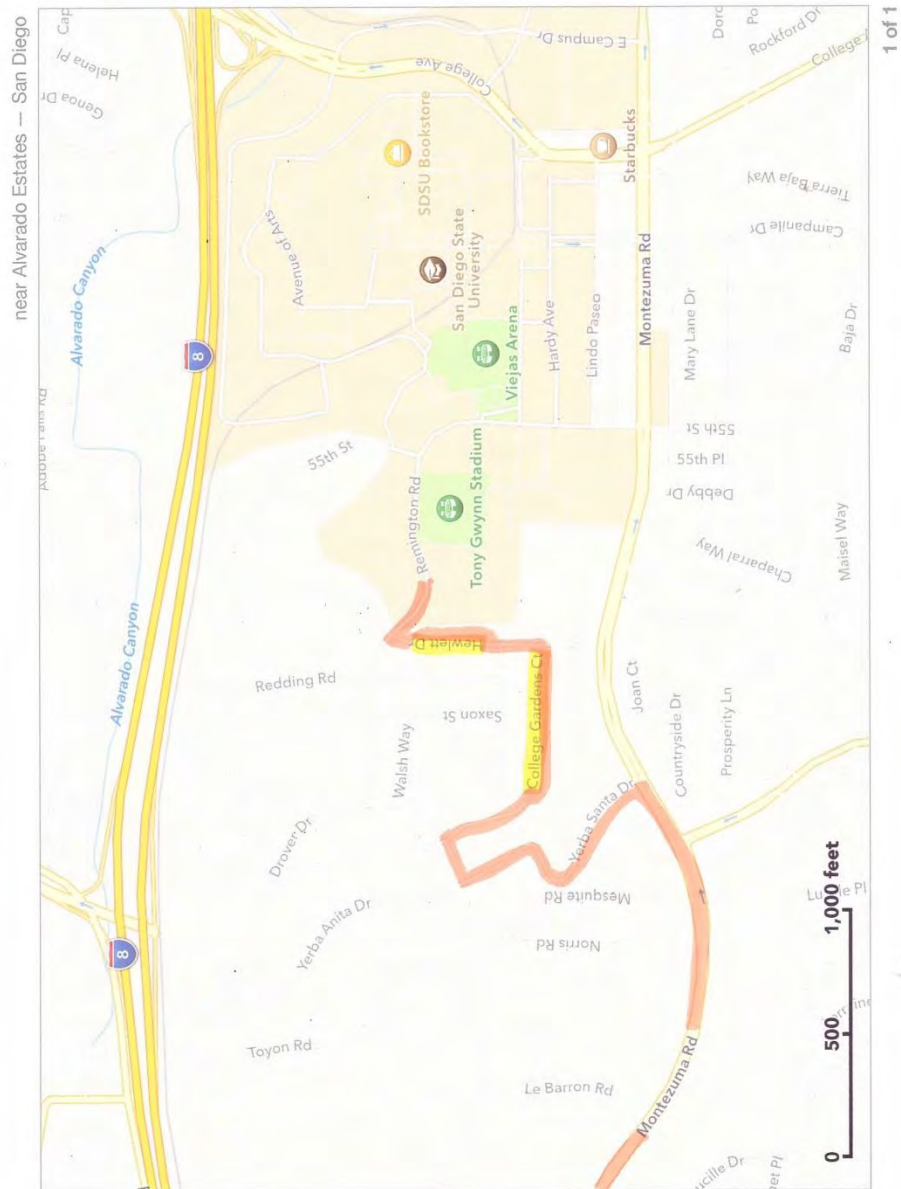
## Responses to Comments – Individuals

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\*Note: if one has been shopping at Mission Valley, or has been to the beach, or visiting South Bay, or North County, or Downtown --- one will end up driving Highway 8 East to get back to SDSU. Even when there's no traffic --- and especially when there is traffic --- heading up the hill towards College Avenue on Highway 8, the easiest thing to do would be to get off the freeway before College Avenue -- at the prior exit that leads to Montezuma. From there, it's a relatively simple drive which takes one through the residential streets of College Gardens Court and Hewlett Drive right to the proposed new housing; could very well be both simpler and faster than making one's way up the hill on Highway 8, then through the congestion at the College Avenue off ramp and through the East Campus and on Remington Avenue.

cc: Elliot Hirshman, President, SDSU

## Responses to Comments – Individuals



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## **Response to Comment Letter I16**

**Donna J. Gans**

**May 12, 2017**

- I16-1** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I16-2** The comment is an introduction to comments that follow. No further response is required.
- I16-3** The comment states that Hewlett Drive and College Gardens Court may become an often-used thoroughfare as a result of the Project. However, based on application of the SANDAG traffic model, the traffic engineer determined that only two percent of Project traffic would access the Project site from the west, through the referenced area; 98% of Project traffic would access the site from the east, via 55th Street and Montezuma Road. This distribution pattern was considered as part of the traffic impacts analysis, and it was concluded that the Project would not result in significant impacts to these roads within the meaning of the California Environmental Quality Act. The Project traffic distribution, as derived through application of the SANDAG traffic model, is illustrated on Draft EIR Figure 4.14-3, Project Traffic Distribution, and Final EIR revised pages, Appendix K, Figure 8-1. (See also Draft EIR page 4.14-7, and Appendix K, Sections 3.0 and 8.2.) For additional information responsive to this comment, please also see the responses to comments O-6-29 through O-6-32.
- I16-4** The comment states that as a result of the Project, the impact on Hewlett Drive and College Gardens Court would be “significant on any day when SDSU is in session.” However, in light of the limited distribution of Project traffic through the neighborhood, as explained in response to comment I-16-3, the EIR determined that the proposed project would not result in significant impacts to these streets. The comment expresses the opinions of the commentator and no further response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I16-5** The comment states that the impact upon Hewlett Drive and College Gardens Court “will be enormous” on special event days. However, as explained in responses to comments I-16-3 and I-16-4, the proposed Project will add a minimal amount of additional traffic to these roads and will not result in significant impacts within the meaning of the California Environmental Quality Act. The comment expresses the opinions of the commentator and no further response can be provided or is required.

## Responses to Comments – Individuals

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The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I16-6** The comment refers to a map that the commentator claims supports the prior comments regarding the Project's impacts on Hewlett Drive and College Gardens Court. However, the map only highlights the circuitous route from the Project site through the referenced neighborhood and does not rebut the findings of the EIR traffic analysis nor provide support for the claim that the Project would result in significant traffic impacts in the neighborhood.

**I16-7** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I16-8** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue. **I16-9** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I16-10** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.



**Comment Letters I17**

**SAN DIEGO STATE UNIVERSITY  
PUBLIC MEETING  
MONDAY, MAY 8, 2017  
PUBLIC COMMENTS TRANSCRIPT**

**Recorded By: Dudek  
Transcribed Recordings By: Jamie Carr**

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## Responses to Comments – Individuals

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**San Diego State University  
Public Meeting, Monday, May 8, 2017  
Public Comments Transcript**

**Gina Jacobs:** As I said, we are recording everything based - from your comments spoken in the microphone tonight and those comments will get responded to in the EIR. So, thank you for being here and I'll just start with the first person's card that I have on top here - Steven Schares - Schares.

**Steven Schares:** Schares.

**Gina Jacobs:** Schares. Wonderful. Thank you.

**Unidentified Woman In Audience:**

Steven, if you wouldn't mind - The boys all have finals tomorrow, it is very inconsiderate that they have both of these presentations on school nights, and now you're having this on the first night of finals.

**Gina Jacobs:** Have you filled out speaker cards?

**Unidentified Woman In Audience:**

No.

**Gina Jacobs:** Ok, if you want to, let me know your name. I can rearrange so that after Steven speaks that they can speak first.

**Unidentified Woman In Audience:**

(Inaudible)

**Gina Jacobs:** Ok, thank you.

**Unidentified Woman In Audience:**

You're welcome

**Gina Jacobs:** Steven, thank you very much.

**Steven Schares:** Ok, I won't mince my words. Shame on you SDSU.

You want - You want to rape the environment and the community for money and ego. You don't own Remington Road. What is wrong with you people? You won't be happy until SDSU is the size of Ohio State, fifty thousand

17-1

students. Think of all that money pouring in. When you look in the mirror do you see dollar signs? God help us all. If you met with (inaudible) to the SDSU are left to decide the future. I looked at the conceptual drawings. Did the artists airbrush out the fact that there was a narrow street, Remington, and on the South side was the SDSU baseball, softball, tennis court complex adjoining the street? It appears from these deceptive drawings that the sports complex no longer exists, replaced by a peaceful little lane with trees or grass on either side; how idyllic. Have any of your pseudo developers looked at this road? You seriously need to be lined up and slapped. You want to build monstrosities looming over the narrow street, a gauntlet of high rises blocking everything out, tilting and plunging into environmentally sensitive canyons. What environmental report are you smoking? Don't stop there you greedy opportunists. You already have your eye and your mits on the pie at Qualcomm. Build your giant Lego high-rises down there. You can stack them right next to each other. Probably a good twenty stacks in easily. There's another ten thousand students. You're no different than Spanos. He didn't care about the community either. Like him, you want to just stick it to the public. But don't just follow money, follow the numbers. For those of you who aren't religious, this influx of students and buildings will be a biblical plague of locust descending on the community. Do you movers and shakers at SDSU realize Remington Road will be closed to enter or exit once the project starts? CVE will become an island community. The only entering and exit will be a lining up and down through narrow streets leading out to Yerba Santa Drive and Montezuma – past Alvarado Estates. Every driver will face bumper to bumper traffic entering and leaving. Cars will be backed up to the top of Yerba trying to make a right or left turn out of paradise. Picture that intersection at Montezuma and Yerba - a green light with a half-life of 3 seconds, cars racing down Montezuma. Now picture the opposite – cars lined up at Montezuma to turn left on Yerba. How far back will that line be down Montezuma trying to get through that long wait, short-life turn signal? Airbrush that scene on your conceptual drawing. The communities, both CVE and Alvarado Estates, are being left behind – steam rolled by the neighborhood bully, bitch-slapped by SDSU. Us talking to you is like talking to a wall. Knock your collective heads together and rethink your pompous and audacious stupidity. If you could- if you could see beyond your nose, there's a bit more impact involved than your short-sighted vision would allow.

**Gina Jacobs:** Evan (inaudible).

**Student:** Alright. Okay sorry it is a bit general. I took notes as we went along to get them going. So, um - I just want to start off by asking again why this was during finals week. As you can see there's about five of the students here and I think I kind of know the answer to that question already which is because, every student I know, they don't want to live on campus a second year. At least personally, it costs me twice as much as my freshman year when I was

I17-1  
Cont.

I17-2

I17-3

I17-4

I17-5

I17-6

I17-7

living on campus than it does now when I live in an off-campus apartment, so I mean that's just the first point.

↑ I17-7  
Cont.

The next was, I don't know if a lot of people know what - the level of services they were referring to but D and F are essentially like parking lots on the road so having it be above green - having to be green at level D is - it seems kind of deceitful. Like level B is a really a - is a workable, good strip you want to drive on and have it be at D is - it seems kind of unacceptable and between 3:00 and 5:00 p.m. the streets are already un-drivable, so adding that much more cars to it - cause I know that just - they said that it wouldn't but that's just not realistic.

I17-8

I was wondering how the school was justifying being not on the City Conservation Program while they have sustainability majors and -

I17-9

Not even the sus- the - excuse me, not even the sustainability majors but my regular engineering classes have a huge sustainability focus and my own professors told me that all of our classes are supposed to - excuse me, all our new buildings were LEED certified and that was the plan going forward, which LEED certified is environmental certification. I don't know if this one is going to be, I doubt - I can't imagine it would, but that was what I was told was the focus moving forward for all new buildings and I haven't seen that interpretation at all.

I17-10

Let's see. So, the presentation referenced unavoidable impacts and small insignificant impacts but between all the other housing going up, each one has small impact; it adds up and becomes significant between the project on Montezuma right now and all the other apartments that are going up now as we speak in addition to these dorms, it doesn't seem like those small impacts wouldn't add up to the possible (inaudible). So, I know this one focuses only on this project and (inaudible) that would be a (inaudible) impact but the other ones also count. The newest ones that were just built on College Avenue for instance had small unavoidable impact.

I17-11

I was wondering how the impact would be mitigated during construction and how long construction is going to last - if there's a timeline for that and if the - if it says 358 parking spaces would no longer be needed, like couldn't we build one parking structure that would like handle that because if all we are focusing on is pointing where not to park, it's not really solving the problem of where they're going to.

I17-12

I17-13

I mean it just doesn't seem very thoughtful, this whole process so I was - I mean - I don't know when and where to send these questions or the answer in writing. I don't want to - where or how that's possible but I would love to know when I can see the answers because I didn't see them in the presentation.

I17-14

## Responses to Comments – Individuals

	And again, the focus of why other spots weren't acceptable, its' really focused on the student communities but I know there's a spot right behind the current sophomore housing on Alvarado Road that's just empty lots and I don't see how that wouldn't house a community as well. I know it would be next to traffic but it would be still sophomore housing community if that was what this was intended for. So, I don't see the disconnect between those too as well. So, I mean it's just a lot of questions that I haven't seen any good answers to any of them, but that's – that's all.	I17-15
<b>Gina Jacobs:</b>	Mark Nelson.	
<b>Mark Nelson:</b>	Sorry, standing in the wrong place at the time.	
	Hi, Mark Nelson. I'm a property owner and I'm literally adjacent to Phase III (inaudible).	I17-16
	I can answer the questions about what percentage of sophomores want to live in the dorms, it's 22 percent according to SDSU's survey of 2014. We've gone through an awful lot of Public Records requests. So, a few things. I have done a lot of EIR's, I did about two billion dollars' worth of projects in my career so I got a sense of how this process works. I'm also an expert witness, member of Sierra Club, Nature Conservancy, EDF, and NRDC, in fact I worked for one of the co-founders of the NRDC so, I've got – I got a sense of how this works.	I17-17 I17-18
	I was really surprised that we got blindsided by this in December of '16 given that I found documents involving this back to 2010 (inaudible).	
	So, the 20 – in 2007 there was a Master plan. It was certified as an EIR in 2011. In 2010, they already had this design, in 2013 they re-upped this design and spent more money on it. In 2016 we saw it, so it really seems problematic, especially if they really want to cooperate with the neighborhood.	I17-19
	Did a lot of research on Sophomore Success – the university is using quite a bit of old literature to try to build dorms out of this one. The gold standard is the National Student – let's see, what is it called here- National Survey of Student Engagement and it's basically from the Association of College and University Housing officers. They've been doing this study for a long time. in 1991 and through about 2005, their statement was:	I17-20
	"In our 1991 synthesis, we concluded that living on campus versus living off campus was the single most consistent with in-college determinant of the impact of college".	
	So, they only assess living on campus. Well, their 2005 statement was:	I17-21

"On most engagement measures, there were few differences between students living on campus and those within walking distance. Where differences did exist, they were generally with those farther than walking distance."

↑ I17-21  
Cont.

And in 2016, they took it a step further with additional research – and this was done by the Associate Director of the Indiana University School of Education, where he says that the changing landscape since about 2005 has led to:

"Student residence has an inconsequential effect".

I17-22

Okay, very straight forward. You know – this is research, this isn't made up.

The universities, there's about maybe 20 universities that foresaw sophomores living on-campus. Basically, they've become a little echo chamber. They talk to each other and say, oh, it's a bad idea and they pass that along in between. So, that is really problematic. So, really it calls into question the need for the entire project.

I17-23

Let's see.

Going back to the – going back to the former plans, the 2007 campus plan had two, ten-story 800-bed dorms being built on the east side on the top of Olmeca and Maya which are the two worst rated dorms at SDSU and that's again, according to SDSU's own surveys. So, the CSU Board of Trustees has already certified [the] EIR and they have approved that as part of the campus plans to tear those down and build them back up but (inaudible) that plus 1,200 beds. It would be in a community of sophomores because they just got done remodeling Zura and some others over there so that part has already been done.

I17-24

That same 2007 Plan, that was a certified EIR in 2011, had an 800 bed, ten-story dorm on the parking lot of Chappy. Okay, so that's – that's one- you know, one single structure, 800 beds, ten stories.

I17-25

In 2013, the University again re-upped and paid more money and had two buildings designed that would fit on there that was sort of building one and building two, and add 1,400 students. So, they increased the density – this is all in a parking lot- this is all on disturbed space, there is no encroaching into the canyon, there's no environmental damage, there's no created significant impacts that are unmitigatable. So, you put 1,400 students in the parking lot according to their own design work from 2013 – you get plus 1,200 over at Olmeca and Maya and now you're at 2,600 which is the same number here. You end up with 2,200 kids at Chappy, which certainly is a community, right? They're 20 times bigger than a lot of cities or towns I guess (inaudible). You

I17-26  
↓

## Responses to Comments – Individuals

	can build quite the food service operation; cost effectiveness isn't a problem, economy scale is not a problem. So, one of the two communities that are significantly larger than they are now. The freshman are with the freshman. You can then give up all the dorms that are being used for freshman that really are suites and ought to be for sophomores. So, there- there is a path – or there's a lot of paths forward that really don't include this so - I don't know that we need to have a Phase II construction here. Right? I'm not sure that they include – they've chosen the courtyard design because they liked it and it creates the significant unmitigatable impacts and it creates the need to have to build Phase II. But if they built Phase I the way Phase I is in their 2013 plans, that problem wouldn't exist at all and Phase II would become moot.	I17-26 ↑ Cont. I17-27 I17-28 I17-29 ↓
<b>Unidentified Woman In Audience:</b>	What do you have to say for yourself? Why (inaudible) I mean here's this illusion (inaudible) - here's this illusion. Answer.	
<b>Mark Nelson:</b>	So- so, the last thing that I really want to say is that- you know CalFire is ready to cannon- high fire hazard area. In fact I looked up 5400 Remington, which is Chappy and Chappy's high fire hazard. Right? And CalFire's gone so far as to say that 95% of fires have human causes and that's in these sorts of areas. The USGS has stepped in and said the probability of fires is increasing because people are increasing. You stuff 1,600 kids in the canyon, you increase the fire hazard in the canyon, and to take it even a step further, the plan has got fire pits for freshman along the canyon. I don't know about you, but I know what I would do around a fire pit around a canyon and the fire would be (inaudible) so, I think it's really a problem.  So, again, you know, I think there's a way out of this that doesn't include Phase II and I think that we should push for that. Comments are due June 5, there's no reason to file comments before June 5 right, so you can have all the time you need to think it through. We should probably as a group think about what would be good alternatives for those of us who receive (inaudible) in the neighborhood and then try to push for something that we think makes sense and make our comments heard.  Thank you.	I17-30 I17-31 I17-32 I17-33 ↓
<b>Gina Jacobs:</b>	Jim Hughes.	
<b>Jim Hughes:</b>	My name is Jim Hughes. I'm a 31-year resident of College View Estates.  SDSU proposed to build a massive dormitory complex on the west property line of their campus. On the other side of the property line is a residential neighborhood with 300 plus one and two story single-family residences. By virtue of the proposed development, the residences are a part of the	I17-34 I17-35 ↓

## Responses to Comments – Individuals

community character as defined in CEQA and part of this proposal. Consequently, SDSU must study and must report on the impacts to the residents in the EIR. I ask that this be included in the EIR. The bulk and scale of the proposed project is massive by any standard. Nowhere in SDSU campus, nowhere in the hotels of Mission Valley, in fact, not even the Manchester Grand Hyatt or the Marriot Towers next door, matches the bulk and the scale of the brick dorms – the proposed dorm project. The proposed development is not compatible with the community character of this site. The proposal must be modified and relocated to a suitable site. I ask that this be included in the EIR.

↑ I17-35  
Cont.

I17-36

I17-37

The existing ingress and egress is a single lane, public road, Remington Road. The road is inadequate for the existing Chapultepec Hall. SDSU proposes to increase the number of student dorm beds by more than 5 times without modification to this roadway. This is a material flaw and this must be addressed in the EIR. I ask that this be included in the EIR.

I17-38

The draft EIR identifies 16 other sites on campus capable of this development. The proposed site is the only one that requires destruction of the last native canyon on SDSU's campus. There are several other environmentally superior alternatives that are more compatible including: Parking Lot 15, Parking Lot 17, Parking Lot 2A, and on 55<sup>th</sup> Street at (inaudible) at the 1960 apartments controlled by SDSU commonly known as Albert's Apartments.

I17-39

I ask that these alternative sites on campus be fully analyzed to the degree that the proposed site has been studied for its impacts on the community character and sustainability for this proposed project.

I17-40

And lastly, I want to remind SDSU, the community matters and the community has been ignored.

I17-41

**Gina Jacobs:** Andre Beauparlant

**Andre Beauparlant:** Good evening, my name is Andre Beauparlant, I'm an (inaudible) occupied resident of the college area.

I17-42

You've heard and read many reasons why the face of the canyon dorms are detrimental to the nearby residents. I'd like to point out why it is also detrimental to SDSU.

My previous letter on this draft EIR showed how 10,000-13,000 beds could be built on 55<sup>th</sup> street. This compares to the scant 2,700 beds in the proposed project. Based on \$1,000.00 a month per bed in annual income dollars, there would be about 24 million dollars for the proposed site versus 90 million to 115 million dollars for 55<sup>th</sup> Street

I17-43  
↓



## Responses to Comments – Individuals

	SDSU is neglecting its fiduciary responsibility by not pursuing the more lucrative 55 <sup>th</sup> Street option.	I17-43 ↑ Cont.
	Another detrimental effect to SDSU caused by the canyon dorms is that SDSU's nationwide reputation will be greatly reduced, especially in the environmental field. On SDSU's website it declared that the 21 <sup>st</sup> century would be the century of the environment. Destroying a canyon by building dorms in it shows these words to be meaningless to SDSU. These canyon dorms will be the poster child of how to destroy a canyon. Photos of before and during construction of this canyon destruction will go viral on social media destroying SDSU's reputation in the environmental field.	I17-44 ↑ I17-45 ↑
	What is this SDSU canyon destruction teaching these SDSU students by SDSU walking the walk instead of just talking the talk about environmental application to the real world?	I17-46 ↑
	Why would students want to go into environmental studies at SDSU? Where are the professors of environmental studies that should be protesting this canyon destruction? How will these environmental professors explain this to their nationwide colleagues? They will lose their respect and credibility and be shamed out of their organizations. SDSU might as well remove all majors in environmental engineering, environmental sciences, and sustainability and replace them with a major called "canyon destruction." I respectfully request President Hirshman to remove Phase II and Phase III of the canyon dorms and replace them with 25-story dorms on 55 <sup>th</sup> street that can hold a total of 10,000-13,000 beds. His reputation at SDSU and nationwide will increase by saving SDSU from itself by preserving a rare and endangered SDSU canyon.	I17-47 ↑ I17-48 ↑
	Thank you.	
<b>Gina Jacobs:</b>	Chris Schultz.	
<b>Chris Schultz:</b>	Our neighborhood has 341 homes and access is constrained to two two-lane roads. Construction of this dormitory project will choke off one of those two-lane roads, initially by construction traffic, personnel, material deliveries, and tower cranes and in the future with vendor deliveries, student move-in/move-out periods, pedestrian, bike, and skateboard traffic.	I17-49 ↑
	This is in addition to the events that take place at Viejas Arena and various sporting complexes near the site.	I17-50 ↑
	Emergency response times may be affected, as well as environmental issues, by building on a protected canyon.	I17-51 ↑
	There are other areas with better campus access where this project can be built that does not impact the 341 homes in this neighborhood.	I17-52 ↑

## Responses to Comments – Individuals

	San Diego State University needs to reconsider its intentions and the impact to the adjacent community.	I 117-53
<b>Gina Jacobs:</b>	Sarah.Ellis.	
<b>Sarah Ellis:</b>	Hi, this is not my thing to get in front. I am a teacher and I can do it really well with my children - so this is - I'm stepping outside my comfort zone.	
	I am a resident, have been a resident for 50 years here. I don't know much about these letters "E-I-R" but I've been trying to learn.	I 117-54
	I am, as you can see, a lay speaker, kind of nervous here.	
	I taught 30 years at Franklin Elementary in Kensington, which is an esteemed magnet for science, and I always taught my children if you are passionate about something you must speak out and you must take action and hopefully make a difference.	I 117-55
	So, here I am. I am a Lorax and I am speaking for the trees and also, as Dr. Seuss did, many years ago, I am also speaking for animals, bushes, and also remembering about the balance of life, which will become out of balance when tampering with the food chain.	I 117-56
	At Franklin Science Magnet, I taught a play called "Tide Pool Condos" when we had to teach about the 4 <sup>th</sup> grade unit for San Diego Unified School District was about the ocean habitats and the environments.	I 117-57
	In this play- musical play- I'm envisioning that San Diego- and I'll tell you more about it - is the developer and will be destroying the canyon habitat. As the developer - in this play that I did - wanted to build on the tide pools - I realize this is just a play, but it's true here, I believe this will kill.	I 117-58
	San Diego State is my alma mater of which I am no longer proud. Why am I teaching children about saving the environment if you are choosing to destroy it when there are other possibilities?	I 117-59
	Lastly, why not tear down old dorms as the owners torn down the old 50's apartments on Montezuma Road? Since I've been here since that time, I saw those dorms, those apartments, get torn down and now you can see, if you drive down Montezuma Road, those great 4-story apartments.	I 117-60
	I want to say again, we as residents want places for students like you do, and so please think and choose a different place. Choose for the Lorax and the canyon habitat and all the life that's teeming there.	I 117-61

## Responses to Comments – Individuals

	Thank you.	
<b>Gina Jacobs:</b>	Ann Cottrell.	
<b>Ann Cottrell:</b>	Hi, Ann Cottrell, College View Estates.	I 117-62
	I have to say, I am really, really offended that the University where I taught for 35 years and thought I respected, so blatantly lies when they say that because they're not bound by city zoning – and this is a quote from the EIR, "there is no impact."	I 117-63
	I beg to differ, there is an impact. It is overwhelming; the destruction of the sensitive, wild canyon, placing the tallest buildings anywhere on campus, next to a single-family road and next to single-family houses. Fourteen stories is more than twice the height of the dorms that were built on a residential street – up in – the commercial streets of College and Montezuma.	I 117-64 I 117-65
	Ok, I understand, it's true that you are not legally obligated to mitigate – that doesn't mean there is no impact. But I would hope for a glimmer of moral or ethical responsibility to adhere to the principles that the University should well know principles of good urban planning and environmental stewardship.	I 117-66
	You say in the EIR that you want to replicate the east side residential community on the west side. That's a great idea, you can absolutely do it. Now this is what the (inaudible) of the east side are. You can do this on the west side. No building over 8-stories, no building on the canyon, two dedicated, real service roads, and absolutely no access from a public road. You can't get to those from Montezuma.	I 117-67
	Phase I beautifully replicates the thing they are trying to do. It brings the campus community, it brings much needed housing – I'm sorry – dining facilities, and so on. So, you still get a large community, you get the facilities. If we only do Phase I, where are you going to put the students that would be dislocated by not moving to Phase II and III. The obvious solution is to create a large residential community on 55 <sup>th</sup> .	I 117-68 I 117-69
	Clearly, you are going to be replacing those outdated, old apartment buildings. What are you going to do there? You haven't told us. You need to have a general plan; there is none so we can put this in the larger context of all the development.	I 117-70
	Following the logic in the EIR, that you don't want isolated dorms like Chappy, I would suggest two logical places for the students that would have been II and III. One is Villa Alvarado. There are 350 very lonely students way out there, surrounded by a very large and very underutilized parking lot, so that would be one place and – another 9-story building could be built on the	I 117-71 I 117-72

## Responses to Comments – Individuals

	parking lot next to the University towers. Those are just two places. Your own map of a year and a half ago identifies 13 others.	↑ I17-72 Cont.
	Thank you.	
<b>Gina Jacobs:</b>	Jody Rowley, Rowley.	
<b>Jody Rowley:</b>	I'm wanting to clarify something that you said about the – what you said about traffic. We do want added signage, but what we really want is enforcement. And that's – that's what needs to be done. It doesn't matter how many signs or how red the curb is, there's no parking. It's like your bridge, we have all the nice signs that say no bicycles, no skateboards, and you never enforce it, the kids are always going over it and we don't expect that you are going to enforce the signs that you put up. We want you to enforce the traffic laws on the public street. If that means that you have to call the police to make it happen, then that responsibility falls to you. If you are not going to enlarge the road and if you are not going to find students a place they can offload without impeding traffic on that section.	I17-73 I17-74 I17-75
<b>Unidentified Man In Audience:</b>	(Inaudible) Campus police, no parking signs, red zones, and car after car after car.	I17-76
<b>Jody Rowley:</b>	So, you don't – and because it doesn't suit getting those kids in and out and it's the only way that it can be done.	I17-77
	Additionally, I wanted to make a comment about no gnatcatcher's being found in the canyon by Dudek and yet as they start to do the undergrounding on (inaudible), Dudek came to me and asked if they could place sound-recording instruments in my canyon because gnatcatchers have been found in the canyons, and so I am a little confused – if one of our canyons have gnatcatchers, how is that they were overlooked in the other canyon.	I17-78
	Additionally, when you read things like this, we call it – in my household – passing the giggle test, and what didn't pass the giggle test was there were no reptiles found in that canyon.	I17-79
	And so when you see things like this, it raises our red flags and makes us wonder, how many other things have you not shared with us?	I17-80
<b>Gina Jacobs:</b>	Helda Rodriguez-Babbick.	
<b>Ms. Rodriguez:</b>	I am a teacher as well, but I have to qualms about speaking in front of adults. I'm fired up, okay!	↓ I17-81

Because everything was so - kind of machine gun, (inaudible) so please forgive me. When I teach I'm oh so consistent here, okay.

↑ I17-81  
↑ Cont.

How is the impact of on-campus housing translated to graduation? The young man was - actually stated: do they even want to live on campus? That's the question. There is a proposed need and to me it's only proposed. When my husband proposed, I could have said yes or no. So, I'm just kind of wondering. So - I know more than you need to know.

↑ I17-82  
↑ I17-83  
↑ I17-84

And then we mentioned that in the previous meeting that on-campus, residential students - (inaudible) - don't have cars or have a lower percentage of cars. What happens and what is our recourse when those students decide that they love San Diego and they want to get around and the trolley just won't do? Where do those cars go, what is our recourse? Do we say we need you to pay \$1,000.00 dollars if you want to buy a car so that we can feel better? I don't know, so that's an unanswered question and that's why I am so glad it's being recorded.

↑ I17-85

What is the difference between freshman and sophomore housing let's just - something I threw out and again, my wondering is what is mitigation? My definition of mitigation is completely different from what was presented. That mitigation has some kind of money attached to it - that's not what mitigation means to me, that's not how I - the way that I teach it to my fifth graders. They know what mitigation means so I'd like to have us define our terms a little bit more and who is the recipient of that mitigation benefit.

↑ I17-86  
↑ I17-87

We are part of the community here; we will not be if Phase II and Phase III happens. We will be isolated. I will be requiring a bridge or a moat because my next question is: how will we mitigate the ability to get out? We can barely get in or out. We will not be able to use Remington, I guarantee it and, here's another thing - and I have to read this: What mitigation plan is in for traffic that will be funneled through College Garden - I am a College Garden Courts resident - because 55<sup>th</sup> and Remington is not going to be widened. We will not have any way out because everyone will be there using it, especially kids - the 3,000 kids and their 1,800 (wink, wink) plus cars. And what is the community recourse when we are impacted? We are impacted by the cars, but not only that, but what about when college life starts oozing into our community? We have this kind of relationship right now where it's like, ok, you stay there, we stay here, this is your area, but now this is going to be a thriving, vibrant community. They are going to want to thrive and vibrate all over.

↑ I17-88  
↑ I17-89  
↑ I17-90

I'm just thinking from my heart, ok? And I - I'm new to this community. I've been here for 5 years, and I love it, I adore it. It's the most peaceful place in the whole wide world and you would never, never know it and every one of

↑ I17-91  
↓

## Responses to Comments – Individuals

	my friends say “oh my gosh, we used to live out in the sticks - nowhere near the peace that we have.” I would like to keep that peace if you don’t mind.	I 117-91 Cont.
	So, my question is, this is a purposed need – what evidence study – I am all about studying right now, I am getting my masters so I’m doing lots of research.	I 117-92
	How about – here’s – here’s this, I have two students- former students, so proud. One is valedictorian in engineering. He comes from City Heights – that’s amazing. I have another student who’s graduating this Saturday and she is a former student of mine, City Heights as well. Why don’t we recruit more local students who live here? Who can drive and perhaps we build nice parking over things that we already have impacted so that we don’t destroy something else?	I 117-93 I 117-94
	I just had to put this in, in just one of the – who said giggles? Gigggle test? What a convenient error. What a convenient error that all those environmental impacts don’t really affect the areas around San Diego State University.	I 117-95
	How will we – ok, seeping into our residence areas, we already covered that.	I 117-96
	Why was College Gardens Court not part of the little map that had the little red and green lines through it?	I 117-97
<b>Unidentified Woman In Audience:</b>	Exactly.	I 117-98
<b>Ms. Rodriguez:</b>	I’m just wondering – and adding to that, when were these traffic studies done? Where they done in December, where they done in April? Were they done in summer time when there are no students around to impact the traffic?	I 117-99
	So, I’m doing some studies, I’m doing some dates and I’m just really concerned that from what I know, I came into this late I had a family issue which prevented me from coming to the previous meetings, but I came in November and I got the impression that you were all kind of, you know, just impacted by the change in the scope of this job – that you were told one thing in December and all of a sudden, wham, oh by the way, there’s Phase II and III.	I 117-100
	That to me is an untruth and I cannot have faith in that and as proud as I am, you can just tell my husband, I am so proud of my two students that they graduated from my alma mater. I worked hard, they worked hard. I will be there Saturday and Sunday, proudest bunch, their 5 <sup>th</sup> grade teacher. I have to temper that by the behavior of my alma mater and that hurts.	I 117-101

## Responses to Comments – Individuals

	So, I am going to leave you with these words: be thoughtful, be resourceful, be smart, be tenacious, but be kind.	I17-101 ↑ Cont.
<b>Gina Jacobs:</b>	Diane Cottrell.	
	Diane? I'll put that towards the back in case she comes back. Eleanor Lynch.	
<b>Eleanor Lynch:</b>	Hello, my name is Eleanor Lynch. I am speaking as a professor emeritus from San Diego State University and as a resident of College View Estates.	I17-102
	I am a supporter of more housing on campus, that's fine, that's okay. Many of us are, but I am extremely concerned about the Draft Environmental Impact Report's analysis of alternative sites.	I17-103
	CEQA guidelines require a description of a range of reasonable alternatives to any proposed project and to its location, which would feasibly attain most of the basic objectives. Not all, just most of the project but would avoid or substantially lessen any of the significant effects of the project. Given that the overall goal of this project and the first two objectives of the eight that are listed all have the intent to build on the Westside campus, the bias against any open-minded analysis – any objective analysis of those alternative sites is overwhelming. It's a biased study.	I17-104 I17-105
<b>Unidentified Woman In Audience:</b>	Inaudible.	
<b>Eleanor Lynch:</b>	The project could be developed on campus and owned properties as people have already said.	I17-106
	On the East side of campus, such as Parking Lot 2A, as one example; that location is closer to classrooms, to student union, the health services, the counseling services, the library, the dining options, Trader Joes, and the trolley. And the rest of the commercial housing and commercial hub that is now South campus Plaza. Despite its advantages, they would rule this out. There is still an alternative though on the west side that meets the project goal. Its west campus so it meets the project goal and it meets all, it meets all but two of the eight objectives. Even better, it does so without destroying the canyon. Locating the proposed project in Parking Lot 9, which is already part of the plan, and in the 55 <sup>th</sup> Street peninsula kind of makes it work. It's reasonable, its workable, and it is a sensible alternative, but it too was readily dismissed in the draft report. SDSU argues that this site – Lot 9 – would not create a distinct west campus housing neighborhood. Yes it would. Chappy, Parking Lot 9 are already in the proposal, the apartments on 55 <sup>th</sup> are adjacent. Now to me, that kind of suggests it might be workable as a community. They	I17-107 I17-108 I17-109

## Responses to Comments – Individuals

	argue that they couldn't accommodate a large enough number of beds and associated amenities but, yes it could. Even more 14-story dorms could be built without disturbing the canyon or the adjoining neighborhood of single family homes. As to amenities, you are building all new amenities for the proposed project so that doesn't really count as an argument against this. SDSU also argues that they do not own the property on 55 <sup>th</sup> . True, true. But all but one of the properties is owned by Aztec Shops, a 501c3 non-profit associated with San Diego State. Thousands of San Diegans, including many people in this room, have just raised \$800,000,000 for San Diego State University. It seems only reasonable, that the University and Aztec Shops could find a way to transfer that property for campus use.	I17-109 Cont. I17-110 I17-111 I17-112
	They argue that the 770 beds will be lost during the demolition and construction of the project; however, losing 770 beds, for a short time is absolutely nothing compared to losing a pristine ancient canyon forever. The beds can be replaced, canyons can't, nor can healthy vibrant neighborhoods. Thank you.	I17-113
	Before I move on, if I could just request one thing. Could you please put the slide up, maybe for the rest of the evening, of what President Hirshman said. Thank you.	I17-114
<b>Unidentified Man In Audience:</b>	Is that the recording device.	
<b>Gina Jacobs:</b>	That is not the recording device. We are recording in the back of the room. Gary Campbell.	
<b>Gary Campbell:</b>	My name is Gary Campbell. I am President of the College View Estates Association, but tonight I want to speak for myself and as a neighbor and an educator because a bunch of people from this neighborhood speak very well for themselves and I want to give my own personal perspective on this.	I17-115
	Back in December, when Nicole Borunda first told me about this project, I was very excited. We really need more campus housing where students can live on campus and I was glad to hear that was going to happen. The first thing I said to her was "I hope it's going to be affordable housing" because school is already expensive enough for our students. And she said "our housing is already inexpensive. We believe we are very reasonable." So, I went on the Cal State University Trustees website and I happened to find a list of the cost of housing at different universities and we are far from the least expensive housing in the Cal State system. We are not the very top but we are in the upper echelon. So, there used to be affordable housing on campus for our students so that they will want to live there	I17-116



I also was excited once she told me about the Sophomore Success program because as an educator, I know that small learning communities can have great value. In fact, I have a BA degree and two Masters degrees. Two of those degrees were in small learning communities and I thrived in those programs because, unlike the one master's program that I was in at Cal State L.A. where I felt like a number and was completely lost and I got no support and never saw a student more than once in a classroom, I didn't thrive there. But, when I was in a program with people like myself, where we were each other's support, I did really well. In fact, for the first time in my life – when I got my BA, I graduated Magna Cum Laude and I gave that both to my professors but also my fellow students because we all were each other's support and we didn't let anybody fail and so, I was excited. But then the next day the actual – was it D? What was the first one called that I've forgotten now? That resulted in a scoping program? When it came, and I saw the program – there were no pictures – it was just a description, I was shocked. I could not believe, because putting over 3,000 students in 11 and 14 story dormitories is not a small learning community. There is no way to get to know your fellow students when you're living in high-rises with thousands of other students. So, this program doesn't match the idea of providing sophomores' success. It would be far better to have smaller dorms scattered through the university but grouping the students together so that all of the nursing students are together in one place, all of the education students are in another place, etcetera, etcetera, so that they can become a small learning community where they get to know each other. Instead, what are they doing, they're putting them all together in these huge high-rises. If you have ever lived in a high-rise you are lucky if you know the person across the hall. It's not a good situation.

Then we have the meeting, where they showed us the pictures. And if it sounded bad, everybody in this room gasped when they saw those casino-like structures. A 14 story - it's really two buildings, it looks like they are joined together - right next to our neighborhood in a protected canyon. Four, 11-story dorms behind Chappy. If you thought Chappy was ugly, can you imagine four more of them? Again, in our canyon – destroying our canyon. That is irresponsible, it's not defensible and I truly hope that President Hirsleman lives up to this promise because I think that would indicate to the community that we can have the beds that are needed for students but have them built in a responsible way. However, we need to see this design prior to the June 5<sup>th</sup> deadline to make our comments.

And the sooner that happens the more likely you are to get the support of this community. Thank you.

**Gina Jacobs:** Greg Babbit.

I17-117

I17-118

I17-119

I17-120

I17-121

I17-122

## Responses to Comments – Individuals

**Greg Babbitt:**

First of all, I would just like to hope that you would all consider some alternatives that are very reasonable and take time to think about them. In the first presentation, it was mentioned that the alternative sites were dismissed through weighted criteria and objectives. I would like to know whose objectives and criteria were used? Were the residents even considered? Or contacted about this and the impact those objectives might have? I feel a little suspicious, and being suspicious at the very least is probably, this has probably been considered since 2013 as mentioned earlier. Maybe as early as 2010 but yet, I don't know the name of the parking lot, but you go down the street right across from Viejas, they built a field. I'm not sure it's needed, I like sports, they're kind of cool, but now it doesn't surprise me, I feel like this is being built for the purpose to build a field. Now, now we are going to present the project and oh, this field is already built - we can't use it anymore. That would have been a perfect place to put some dorms.

Also, it is mentioned that mitigation on Montezuma Road is infeasible – so what are we supposed to do. In the morning it's already a nightmare, a huge nightmare and it's getting to be very dangerous and people don't want to wait at lights and they're hopping on the road trying to get onto Fairmont and they're cutting people off left and right. There is more and more accidents down there [inaudible] traffic. I feel like you are irresponsible "Oh that really isn't our problem, it's infeasible and we aren't going to deal with it." To me, that is unacceptable.

Lastly, whatever phase you end up putting in, I propose putting in some type of curb or pathway like you have on Montezuma Road to keep the cyclists and the skateboarders off of Remington Road - because they are a hazard right now. They run lights all of the time. Again, today I almost ran into the same guy twice. There was a green light and he ran across in front of me and towards the police station as I was turning right. [Inaudible] He didn't care. And with all of these other people, it's really going to get dangerous. I really don't want somebody to get hurt. So, if you curb that so cyclists and skateboarders can stay there and the path, at least, gets to the signals. It needs to be safer so no one will get hurt. That's it.

**Gina Jacobs:** Christine Shea.

**Christine Shea:** Hi Community. My husband Stan and myself, Christine Shea, and our one year old daughter, we are most concerned about Phase III because it's in our backyard and we are kind of up here to make an emotional appeal. We live on Hewlett drive. We are directly facing Chappy Hall right now and we bought our house three years ago. I am so upset that we didn't know about this before buying our home and that we could have thought about and now it has to be full disclosure if we are going to sell our house and we don't know how it's going to impact the property value. That's one thing. The other is trying to raise our family. I'm not sure how many hundreds of feet go to the bottom of

I117-123

I117-124

I117-125

I117-126

I117-127

I117-128

I117-129

I117-130

## Responses to Comments – Individuals

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the canyon exactly until that wall is going to be there and it's going to feel – I've been in New York City – it's going to feel a little bit like that because of the height. Also, we are slightly challenged with privacy with Chappy Hall. We have, thankfully, such a great community who have a great relationship with SDSU and that we are able to communicate our concerns if there are parties going on or anything like that. Thankfully, Chappy Hall hasn't been too bad. We hear occasional yelling in the middle of the night but, you know, we are able to speak up when things happen and, you know, it's a great community that we have. Um, but, you know, we can still kind of see what's going on over there and they can see what's going on on our back deck. We are the cute little blue house with the back deck that does not have any trees blocking it. We thought about putting in huge pine trees but what would that cost. We are hoping to redo the deck maybe cover it a little bit. I just want you guys to know how personal this is for my family and that I wish that we knew and to reiterate like, just be kind. Thank you.

↑ 117-130  
Cont.

117-131

**Gina Jacobs:** Kim Wilson.

**Kim Wilson:** Hi. I will keep it short. Some of my neighbors brought up the college Garden Court problem. (Inaudible) You were supposed to study our neighborhood but you didn't include our neighborhood drive-through at all. Although Google shows it and all of the Uber and Lyft cars go through our neighborhood to pick up students and back out. If you close Remington for construction, everyone will be going through my street. I have two little kids. I try to tell them not to go run out after a ball. If they get hit by someone going through, I am going to blame you.

117-132

117-133

**Gina Jacobs:** Diane Cattrell. Did she come back? Those were all of the speaker cards that I had for this evening. And again, you see the message here from President Hirschman and as it relates to the process. The comment period is open until June 5<sup>th</sup>. This presentation is going to be posted on the website to share with you. All of the entire EIR is also posted there for your review. Your comments can be submitted in writing as well via e-mail or mail in writing.

## Responses to Comments – Individuals

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I, Jamie Carr, am an assistant for Gatzke Dillon & Ballance LLP. As part of my administrative duties, I transcribe public hearings and other recorded meetings. I declare that I have created this transcript from digital recordings prepared by Dudek to memorialize the public meeting held on Monday, May 8, 2017 in the matter of San Diego State University's Draft SDSU New Student Housing Project Environmental Impact Report.

Dated: May 19, 2017



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Jamie Carr, Assistant at Gatzke Dillon & Ballance LLP

## Responses to Comments – Individuals

<p>SDSU New Student Housing DEIR Public Comment</p> <p>Name: Stephen Schares</p> <p>Address: 5531 Drovers Drive</p>	<p>SDSU New Student Housing DEIR Public Comment</p> <p>Name: Kristine Chieh</p> <p>Address: 5425 Haskett drive</p> <p>I'd like to share about my concerns as a homeowner on Haskett drive, where my back yard faces Chapultepec domus.</p>	<p>I17-134</p>
<p>SDSU New Student Housing DEIR Public Comment</p> <p>Name: Kevin Hoffer</p> <p>Address: 4766 63rd St SD, Ca 92115</p>	<p>SDSU New Student Housing DEIR Public Comment</p> <p>Name: Mark Nelson</p> <p>Address: 5417 Haskett 92115</p>	
<p>SDSU New Student Housing DEIR Public Comment</p> <p>Name: RANDI MCLENDIE</p> <p>Address: 5127 WALSH WAY</p> <p>DO ANY OF THE COMMENTS MADE MATTER? WILL THE UNIVERSITY JUST DO THIS ANYWAYS WHETHER THE COMMUNITY CARES OR NOT? IS IT A DONE DEAL? THANKS</p>	<p>SDSU New Student Housing DEIR Public Comment</p> <p>Name: Greg Bobick</p> <p>Address: 4931 College Gardens Ct 92115</p>	<p>I17-135</p>
<p>SDSU New Student Housing DEIR Public Comment</p> <p>Name: DON COTTRELL</p> <p>Address: 5111 Marquette Dr. SD. 92115</p> <p>Not present</p>	<p>SDSU New Student Housing DEIR Public Comment</p> <p>Name: Ginger Fox</p> <p>Address: 5349 Redding Road</p> <p>Did not speak</p>	

## Responses to Comments – Individuals

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### SDSU New Student Housing DEIR Public Comment

Name: *Sara Ellis*  
Address: *5511 Brown Dr.*

### SDSU New Student Housing DEIR Public Comment

Name: *Jody Rowley*  
Address: *5111 Bixel Dr.  
San Diego, CA 92115*

### SDSU New Student Housing DEIR Public Comment

Name: *Chris Schultz*  
Address: *5512 Drown Dr  
San Diego CA*

### SDSU New Student Housing DEIR Public Comment

Name: *Kim Wilson*  
Address: *College Gardens Ct.*

### SDSU New Student Housing DEIR Public Comment

Name: *Andre Beauparlant*  
Address: *5346 E. Falls View Dr, SD*

### SDSU New Student Housing DEIR Public Comment

Name: *Hilara Rodriguez-Babick*  
Address: *4931 College Gardens Ct.*

### SDSU New Student Housing DEIR Public Comment

Name: *Ann Cottrell*  
Address: *5111 Manhasset*

### SDSU New Student Housing DEIR Public Comment

Name: *Jim Hughes*  
Address: *5402 Brown Dr.*

## Responses to Comments – Individuals

### SDSU New Student Housing DEIR Public Comment

Name: Eleanor Lynch

Address: 5260 Remington Rd.

### SDSU New Student Housing DEIR Public Comment

Name: Gary Campbell

Address: 5153 Remington Rd  
San Diego, CA 92115

### SDSU New Student Housing DEIR Public Comment

Name: Rachel Drexler Dukes

Address: 7138 Walsh Way  
San Diego CA 92115

Comment:

I am concerned about emergency response during (and after) construction. Several thousand residents will potentially be 'trapped' during fire, earthquake and medical emergencies due to traffic stoppages on Remington Rd. & slow traffic at Yerba Santa & College Gardens Ct.

I 117-136

I 117-137

### SDSU New Student Housing DEIR Public Comment

Name: P. A. McGann

Address: 5152 Remington Rd

Comment:

No Provision for 3000 more in  
move out traffic

I 117-138

No Provision for 3000 student  
bikes, skateboards & pedestrians  
crossing 55th on Remington.

I 117-139

#1 Mark Nelson

landLAB

WORKS ABOUT AWARDS IN THE FIELD ON THE BOARD THE TEAM CONTACT

SDSU Plan for West Campus MEGADORM Completed 2010

SDSU West Campus Housing Masterplan

**The Facts**  
**Location:** San Diego, CA, USA  
**Size:** 16 Acres  
**Partners:** Carter Johnson Architects  
**Budget:** \$10.1M  
**Completed:** 2010

**About the Project**  
 landLAB collaborated with Carter Johnson Architects on the master plan for the West Campus housing at SDSU. The landscape draws inspiration from historic gardens and architecture of the Alhambra. Perched high on a hillside, the gardens, terraces and roof deck are oriented to capture views of mountains beyond. Bougainvillea covered arcades direct the user into the main entry porches and public spaces. Series of courtyards provide interest and create a variety of spaces for both the public and for residents. A large fire pit activates the main dining terrace. A pedestrian bridge and elevator connects the main dining facility to the Canyon Towers and Canyon View Park at the lower level. Centered on the North side of the development, the grand staircase that provides a direct route from the main dining terrace down to the Canyon Trails (and access to road). Along this spine access road, visual scale is conveniently located, to grab a quick bite on your way to class, or a sunny place to hang out and meet up with friends.

SDSU New Student Housing DEIR Public Comment

Name: Mark Nelson

Address: 5417 Hawlett Dr

Comment:

The threshold for cumulative impacts in CEQA is low. Why was this 2010 work not in the May 2011 EIR certificate for the Draft Campus Plan?

Attached: #1

I 117-140

I 117-141

I 117-142



**Response to Comment Letter I17**

**San Diego State University Public Meeting  
Public Comments Transcript  
May 8, 2017**

- I17-1** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-2** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-3** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-4** The comment incorrectly claims the proposed project includes the closure of Remington Road, and, as a result, claims that College View Estates will become an island community subject to increased traffic. Preliminarily, the proposed project does not include the closure of Remington Road; Remington Road will remain open to serve the community as it has in the past. To the extent the comment is referring to increased levels of traffic through College View Estates, the geographic distribution of vehicle trips generated by the proposed New Student Housing project was determined using the SANDAG travel demand model. The model is a computerized travel demand model that utilizes a sophisticated trip distribution function to derive the distribution of vehicle trips. Based on application of the SANDAG model, the traffic engineer determined that two percent of Project traffic would access the Project site from the west, through the College View Estates area. Specifically, the model showed that approximately 98% of Project generated traffic would drive east on Remington Road or Canyon Crest Drive while approximately 2% would drive west on Remington, into the College View Estates neighborhood. As a result, the Project would add less than 50 peak hour trips to the roads located in the College View Estates. The Project traffic distribution, as derived through application of the SANDAG traffic model, is illustrated on Draft EIR Figure 4.14-3, Project Traffic Distribution. (See also Draft EIR p. 4.14-7, and Appendix K, Sections 3.0 and 8.2.) To the extent the comment is referring to a potential temporary closure of Remington due to project construction activities, the EIR includes mitigation requiring

## Responses to Comments – Individuals

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preparation and implementation of a Traffic Control Plan to provide for the safe and effective movement of vehicles, pedestrians, and bicyclists through or around temporary traffic control zones. (See EIR mitigation measure MM-TRA-5.)

- I17-5** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-6** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-7** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I17-8** The comment disputes the appropriate levels of service used in the traffic impact analysis to assess the Project's traffic impacts. However, the analysis was conducted using thresholds established by both California State University and the City of San Diego and is the basis recognized by each respective jurisdiction for an EIR's assessment of traffic impacts.
- I17-9** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-10** The comment is acknowledged and appreciated. The Project would be designed to a minimum Leadership in Energy and Environmental Design (LEED) Silver Certification, which requires the building to be fundamentally commissioned (commissioning a building is the testing and balancing of the main systems to assure optimum performance), use at least 10% less energy than the United States Green Building Council baseline, and contain systems that do not use any chlorofluorocarbon-based refrigerants. Information relating to the Project's proposed energy usage and LEED Silver Certification design are contained in Section 4.5, Energy Consumption, of the Draft EIR.
- I17-11** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis

## Responses to Comments – Individuals

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and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I17-12** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I17-13** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The Project's impacts relative to parking were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I17-14** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I17-15** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I17-16** The comment is an introduction to comments that follow. No further response is required.

**I17-17** The comment provides a response to a prior comment and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I17-18** The comment is an introduction to comments that follow. No further response is required.

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**I17-19** The comment makes several factual assertions and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I17-20** The comment regards the Sophomore Success program and is critical of the Project's goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. With respect to the Sophomore Success Program, between 2005 and 2013, SDSU studied sophomore student success rates. In 2007, SDSU conducted a study of students living on- and off- campus and found that nearly 86% of students living on-campus for more than one year completed their junior years, an increase of 13% compared to those students who only lived on campus one year and an increase of 23% over those students who lived off-campus. In a study conducted between Fall 2008 through Fall 2013, students who lived on-campus for two years (freshmen and sophomore years) were between 10% and 20% more likely to return and complete their junior and senior years than those that lived off campus after their freshmen year. Also, sophomores that live on campus had higher grade point averages than their counterparts that lived off campus. Sophomores that lived on campus were two times more likely to graduate college within 4 years than their counterparts that live off-campus.

A survey of colleges around the country identified a correlation between engaged sophomores and graduation rates. Specifically, research shows that students who live on campus are better prepared academically, feel more connected to the university social scene, and graduate faster than those who do not. Overall, the data shows that sophomores living on campus experienced approximately 13.5% higher six-year graduation rate, approximately 15.6% higher retention rates to their third year, and approximately 15.4% higher to their fourth year.

**I17-21** The comment refers to independent research and follows up on the preceding comment. Please see the response to comment I17-20 for information responsive to this comment.

**I17-22** The comment relates to the preceding comments and is acknowledged. Please refer to the response provided above for Comment I17-20 for information responsive to this comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I17-23** The comment relates to the preceding comments and expresses the opinions of the commentator. Please see the response to comment I17-20 for information responsive to this comment. The comment will be included as part of the record and made

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available to the decision makers prior to a final decision on the Project. No further response is required.

**I17-24** The comment refers to the 2007 Campus Master Plan. With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I17-25** The comment provides background information and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I17-26** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I17-27** Please see response to comment I17-26 for information responsive to this comment.

**I17-28** Please see response to comment I17-26 for information responsive to this comment.

**I17-29** Please see response to comment I17-26 for information responsive to this comment.

**I17-30** The comment regards potential fire hazards. As identified in the Project's Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones

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were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. There will be no direct pathway for students into the Canyon that does not currently exist. It is arguable that the presence of the new student housing would deter students from entering the Canyon as there will be more potential observers to report such activity. Therefore, the Project complies with the Fire Department's requirements for building in VHFHSZs and does not encourage or facilitate access into the adjacent canyon, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project's new buildings.

- I17-31** The comment regards fire pits. It would be inadvisable to place fire pits directly adjacent to native vegetation at any type of development site, including new student housing. The project would include natural gas fire pits (non-ember producing) within the student recreational areas adjacent to and on the south side of the student housing structures. The fire pits would not allow burning of wood or other materials, would be enclosed to prevent materials from coming into contact with flame, and would be separated from native vegetation by a glass and steel wall and a 6-story building. Further, the fire pits will have hours of operation and can be turned off by operations/management during nighttime hours and during periods of high fire danger (late summer, drought or during Santa Ana Wind conditions). This type of fire pit would not increase the risk of vegetation fire due to the inability of the fire to cause ignitions directly to the vegetation and by preventing flammable materials, which could otherwise produce embers, from coming into contact with the flame. Therefore, the use of the restrictive fire pits is not considered to increase the risk of wildfire.
- I17-32** The comment regards Phase II. Please see response to comment I17-26 for information responsive to this comment.
- I17-33** The comment is a conclusion to previous comments. No further response is required.
- I17-34** The comment is an introduction to comments that follow. No further response is required.
- I17-35** The comment is acknowledged and appreciated. The commentator states that the residences of the College View Estates Area (CVEA) should be considered in the description of project area community character in the EIR. However, pursuant to *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560 (2016), the evaluation of potential impacts of a proposed project on "community character" is not required under CEQA. An extensive analysis of the Project's aesthetics impacts, including the Project's bulk and scale was addressed in the Draft EIR and is contained in Section 4.1, Aesthetics.

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To the extent that the comment relates to alternative siting locations for Phases II and III, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

- I17-36** The comment is acknowledged and appreciated. However, pursuant to *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560 (2016), the evaluation of potential impacts of a proposed project on “community character” is not required under CEQA. An extensive analysis of the Project’s aesthetics impacts, including the Project’s bulk and scale was addressed in the Draft EIR and is contained in Section 4.1, Aesthetics.

The comment expresses the opinions of the commentator as it relates to the bulk and scale of the Project and development in Mission Valley and Downtown San Diego. Existing development on the SDSU campus and in the surrounding College Area is considered in the Draft EIR’s analysis of potential impacts to existing visual quality and character of the site and surrounding area. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise concerns related to the adequacy of the Draft EIR.

- I17-37** Please refer to response I17-35.

- I17-38** The comment addresses traffic conditions on Remington Road. The EIR traffic impact analysis addresses the project’s potential impacts on Remington and determined that the road provides adequate capacity to serve the project traffic without resulting in significant impacts. Beyond that, the comment addresses general subject areas, which received extensive analysis in the EIR. The Project’s impacts relative to Remington Road were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

- I17-39** With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, the comment raises an issue that was studied and evaluated in Chapter 6.0, Alternatives, of the Draft EIR. Alternatives to the Project location received extensive analysis in the Draft EIR. The Draft EIR assessed numerous alternative Project locations and eliminated them because they were

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- infeasible, failed to meet the Project objectives, or failed to avoid or reduce significant impacts. To the extent the comment relates to alternative siting locations for Phases II and III, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated. With respect to any additional Project siting concerns, please see Alternatives Thematic Response for information responsive to the comment.
- I17-40** The comment relates to Project siting and sustainability. The comment is acknowledged and appreciated. However, pursuant to *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560 (2016), the evaluation of potential impacts of a proposed project on “community character” is not required under CEQA. An extensive analysis of the Project’s aesthetics impacts, including the Project’s bulk and scale was addressed in the Draft EIR and is contained in Section 4.1, Aesthetics. Information relating to the Project’s proposed energy usage, sustainability, and LEED Silver Certification design are contained in Section 4.5, Energy Consumption, of the Draft EIR.
- I17-41** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-42** The comment is an introduction to comments that follow. No further response is required.
- I17-43** With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I17-44** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the



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Project. No further response is required because the comment does not raise an environmental issue.

**I17-45** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I17-46** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I17-47** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I17-48** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the ~~A Alternatives Thematic Response~~ ~~Alternative Locations Thematic Response~~ for information responsive to the comment.

**I17-49** The comment states that construction and operation of the Project will choke off one of the two-lane roads that provide access to the neighboring communities. However, as to construction, the Draft EIR includes a mitigation measure requiring the preparation of a traffic control plan, the primary function of which is to provide for the safe and effective movement of vehicles, pedestrians, and bicyclists through or around temporary traffic control zones. (See Draft EIR mitigation measure MM-TRA-5.) As to operation, the Project includes off-street pull-off areas for up to six vehicles to accommodate pick-ups/drop-offs on Remington Road in the front of the new buildings, and the installation of "No Stopping Any Time" signs to deter drivers from stopping their vehicles within the flow of traffic. Additionally, student move-

- ins/move-out will take place on the north side of the new building, far removed from Remington Road, thereby alleviating the related traffic congestion. (See EIR Section 4.14, subsection 4.14.6.5, Access and Other Issues.) Beyond that, the comment addresses general subject areas, which received extensive analysis in the EIR. The Project's traffic-related impacts were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I17-50** The comment refers to the special events that take place on the SDSU campus and the related traffic effect on the neighborhood. In addition to the traffic mitigation and design features described in the response to comment I-17-49, the Project also includes the placement of a permanent sign on Remington Road at the SDSU campus boundary with the College View Estates neighborhood that reads "No SDSU or Event Parking in Residential Neighborhood – Violators May be Fined and/or Towed Away." Traffic Posts will continue on Remington Road at the College View Estates entrance to discourage parking in the residential neighborhood at Viejas Arena, and during baseball games. A temporary sandwich board sign also will be placed at the corner of 55th Street and Remington Road during such events that reads "No Event Parking Beyond This Point." For additional information responsive to this comment, please see Draft EIR Section 4.14, Transportation/Circulation and Parking, pages 4.14-40-41, College View Estates Spillover Parking.
- I17-51** Emergency response to the area following construction is considered to be within San Diego Fire Department's stated response time goal of 7:30 minutes for the first arriving engine. There are two additional fire stations that can reach the site shortly thereafter. Residents of the new student housing would not likely be evacuating a short-notice emergency in their vehicles, removing vehicles from the streets and enabling fire department access to the area.
- I17-52** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

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- I17-53** The comment is a conclusion to previous comments. No further response is required.
- I17-54** The comment is an introduction to comments that follow. No further response is required.
- I17-55** The comment is an introduction to comments that follow. No further response is required.
- I17-56** See response to comment I5-5.
- I17-57** The comment is an introduction to comments that follow. No further response is required.
- I17-58** See response to comment I5-5.
- I17-59** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-60** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I17-61** The comment is a conclusion to previous comments. No further response is required.
- I17-62** The comment is an introduction to comments that follow. No further response is required.
- I17-63** The comment expresses the opinions of the commentator. As a state agency, CSU/SDSU is not subject to local government planning, such as the City of San Diego General Plan. Accordingly, because such local land use plans are not applicable to CSU/SDSU, an analysis with respect to the General Plan's zoning and permits requirements is not required under CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-64** See response to comment I5-5.

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- I17-65** The comment raises building height concerns and compares the height of the proposed Phase II building to dorms located on College Avenue and Montezuma Road. The scale of existing development in the area surrounding the project site is discussed in Section 4.1, Aesthetics, of the Draft EIR. However, the proposed project has been modified to eliminate Phases II and III. With these modifications, all environmental impacts will be mitigated to less than significant. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise any issue concerning the adequacy of the ~~draft environmental document~~EIR.
- I17-66** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-67** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I17-68** The comment is acknowledged and appreciated. The comment expresses general support for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I17-69** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any

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additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I17-70** The comment expresses the opinions of the commentator and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I17-71** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I17-72** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I17-73** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I17-74** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

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- I17-75** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The Project's impacts relative to drop-off and loading/unloading were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I17-76** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-77** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-78** Focused, protocol level biological surveys were conducted within the 8-acre Project site in 2014 and in 2017. California gnatcatchers were observed in the vicinity of the Project site, but focused surveys have not detected any California gnatcatchers on site. See Biological Resources Thematic Response, which describes the California gnatcatcher observed at the Residential Block 701 Undergrounding Utility District Project, located approximately 0.5 mile west and several canyons away from the proposed project, in March 2017. Additionally, the Draft EIR requires additional pre-construction surveys for California gnatcatcher (MM-BIO-6) be conducted prior to any ground disturbing activities.
- I17-79** Focused biological surveys for reptiles were not conducted, and the Draft EIR states that none were detected during the other biological surveys that were conducted. The Draft EIR specifically acknowledges the potential for reptiles to occur on pages 4.3-11 and 4.3-12.
- I17-80** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I17-81** The comment is an introduction to comments that follow. No further response is required.

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**I17-82** The comment is acknowledged and appreciated. The comment is critical of the Project's goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. With respect to the Sophomore Success Program, between 2005 and 2013, SDSU studied sophomore student success rates. In 2007, SDSU conducted a study of students living on- and off- campus and found that nearly 86% of students living on-campus for more than one year completed their junior years, an increase of 13% compared to those students who only lived on campus one year and an increase of 23% over those students who lived off-campus. In a study conducted between Fall 2008 through Fall 2013, students who lived on-campus for two years (freshmen and sophomore years) were between 10% and 20% more likely to return and complete their junior and senior years than those that lived off campus after their freshmen year. Also, sophomores that live on campus had higher grade point averages than their counterparts that lived off campus. Sophomores that lived on campus were two times more likely to graduate college within 4 years than their counterparts that live off-campus.

A survey of colleges around the country identified a correlation between engaged sophomores and graduation rates. Specifically, research shows that students who live on campus are better prepared academically, feel more connected to the university social scene, and graduate faster than those who do not. Overall, the data shows that sophomores living on campus experienced approximately 13.5% higher six-year graduation rate, approximately 15.6% higher retention rates to their third year, and approximately 15.4% higher to their fourth year.

**I17-83** The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I17-84** The comment provides factual background information and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I17-85** The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

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- I17-86** The comment provides factual background information and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-87** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. In addition, the comment request information regarding the definition of “mitigation”. The CEQA Guidelines provide a broad definition of mitigation, which includes actions taken to rectify or compensate for a significant impact. Under 14 Cal. Code Regs. Section 15370, “mitigation” includes the following: avoiding an impact altogether by not taking a certain action or part of an action; minimizing an impact by limiting the magnitude of a proposed action and its implementation; rectifying an impact by repairing, rehabilitating, or restoring the affected environmental resource; reducing or eliminating an impact over a period of time through preservation or maintenance operations during the life of the action; and compensating for the impact by providing substitute resources or environments. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I17-88** The comment raises concerns generally with Phases II and III. Following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. Further concerns contained in the comments refer to economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-89** The comment asks about mitigation for traffic that will be “funneled through College Garden” as a result of the Project. However, based on application of the SANDAG traffic model, the traffic engineer determined that only two percent of Project traffic would access the Project site from the west, through the referenced area; 98% of Project traffic would access the site from the east, via 55th Street and Montezuma Road. This distribution pattern was considered as part of the traffic impacts analysis, and it was concluded that the Project would not result in significant impacts to these roads within the meaning of the California Environmental Quality Act and, therefore,



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no mitigation is required. The Project traffic distribution, as derived through application of the SANDAG traffic model, is illustrated on Draft EIR Figure 4.14-3, Project Traffic Distribution. (See also Draft EIR page 4.14-7, and Appendix K, Sections 3.0 and 8.2.) For additional information responsive to this comment, please also see responses to comments O-6-29 through O-6-32.

- I17-90** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-91** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-92** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I17-93** The comment is an introduction to comments that follow. No further response is required.
- I17-94** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I17-95** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I17-96** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

## Responses to Comments – Individuals

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- I17-97** The comment is acknowledged and appreciated. The map containing red and green lines refers to Figure 2-2, Vicinity Map, contained in Chapter 2.0, Proposed Project Description, of the Draft EIR. According to the legend on Figure 2-2, the red lines indicate the SDSU campus boundary and the green lines (located within the red lines) indicate the Project site, which is within the SDSU campus boundary. Figure 2-3, College Area Community, provides a much larger footprint of the College Area Community, and includes College Gardens Court. Figure 2-3 provides a visual demonstration of the relationship between College Gardens Court and other residential neighborhoods and the SDSU campus, which includes the Project site (using gray shading).
- I17-98** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-99** The comment is an introduction to comments that follow. No further response is required.
- I17-100** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-101** The comment is an introduction to comments that follow. No further response is required.
- I17-102** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I17-103** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

## Responses to Comments – Individuals

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- I17-104** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I17-105** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I17-106** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I17-107** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any

## Responses to Comments – Individuals

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additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I17-108** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I17-109** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I17-110** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I17-111** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for

## Responses to Comments – Individuals

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additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

- I17-112** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I17-113** The comment is a conclusion to previous comments. No further response is required.
- I17-114** The comment is an introduction to comments that follow. No further response is required.
- I17-115** The comment is acknowledged and appreciated. The comment expresses general support for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I17-116** The comment is acknowledged and appreciated. The comment expresses general support for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I17-117** The comment is acknowledged and appreciated. The comment expresses general support for the Sophomore Success Program objective, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I17-118** The comment concerns the siting of the Project and also expresses the opinions of the commentator as to student housing generally. With respect to the siting of locations for Phases II and III, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect

## Responses to Comments – Individuals

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- to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment. As to the commentator's opinion regarding student housing generally, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-119** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-120** This comment expresses the opinions of the commentator in regards to the bulk and scale of the Phase II building as represented in the Draft EIR graphics. The proposed project has been modified to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue or raise any issue concerning the adequacy of the Draft EIR.
- I17-121** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I17-122** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I17-123** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

## Responses to Comments – Individuals

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- I17-124** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I17-125** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I17-126** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I17-127** The comment addresses mitigation on Montezuma Road as infeasible. However, the referenced mitigation relates to project Phase III, which, as noted in the preceding responses to comments, has been eliminated from the proposed project and, therefore, the comment is no longer applicable.
- I17-128** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the

## Responses to Comments – Individuals

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Project. No further response is required because the comment does not raise an environmental issue.

**I17-129** The comment concerns the siting of the Project and also raises economic, social or political issues that do not appear to relate to any physical effect on the environment. With respect to the siting of locations for Phases II and III, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment. As to the commentator's concerns regarding economic, social, or political issues, they do not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I17-130** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

The comment also raises concerns over the height of proposed Phase III development. The bulk and scale of the Project (including Phase III development) is analyzed in Chapter 4.1, Aesthetics, of the EIR. However, the proposed project has been modified to eliminate Phases II and III. With these modifications, environmental impacts will be mitigated to less than significant. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not concern the adequacy of the Draft EIR.

**I17-131** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I17-132** The comment states that the traffic studies did not include the College Gardens area. In fact, the traffic analysis determined that a relatively small percentage of Project



traffic would access the site through the College Gardens area, and that the vast majority of traffic would utilize Remington Road to 55th Street. Specifically, the geographic distribution of vehicle trips generated by the proposed New Student Housing project was determined using the SANDAG travel demand model. The model is a computerized travel demand model that utilizes a sophisticated trip distribution function to derive the distribution of vehicle trips. Based on application of the SANDAG model, the traffic engineer determined that two percent of Project traffic would access the Project site from the west, through the College View Estates area, while approximately 98% of Project generated traffic would drive east on Remington Road or Canyon Crest Drive. The Project traffic distribution, as derived through application of the SANDAG traffic model, is illustrated on Draft EIR Figure 4.14-3, Project Traffic Distribution. (See also Draft EIR p. 4.14-7, and Appendix K, Sections 3.0 and 8.2.)

As to the comment regarding Uber/Lyft, the increased use of ride-sharing services actually has the effect of reducing overall traffic, not increasing traffic, due to the ride-sharing nature of the service. As to the pick-up/drop-off location, the proposed project will include pick-up/drop-off spaces for up to six vehicles in an off-street cut-out area on the north side of Remington Road, in front of the student housing building.

- I17-133** The comment provides factual background information and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-134** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I17-135** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I17-136** Emergency response to the area following construction is considered to be within San Diego Fire Department's stated response time goal of 7:30 for the first arriving engine. There are two additional fire stations that can reach the site shortly thereafter. Residents of the new student housing would not likely be evacuating a short-notice

## Responses to Comments – Individuals

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emergency in their vehicles, removing vehicles from the streets and enabling fire department access to the area.

- I17-137** Evacuation from the student housing buildings would typically include relocating students from the area by foot, except for special needs students who would be provided appropriate transportation. In the event of a wildfire in Aztec canyon fuel (i.e., trees, chaparral) would not be located adjacent to the interior of the Project site or to the south into campus, so pedestrian evacuation would be appropriate, unless the fire department determined that keeping students in the ignition resistant, defensible structures is preferred.

Larger events that require a longer term evacuation of the area would likely include pedestrian relocation followed by a metered evacuation of vehicles once the area had been determined safe for students to return to retrieve personal belongings. For example, considering a wildfire event, because the vegetated canyon to the north includes a relatively small fuel bed, the wildfire would be expected to reach the outer perimeter of the Project's brush management zones (BMZ) in a short time frame and would be short-lived, running out of fuels as it bumped against the BMZ. This type of emergency would not typically require an evacuation of the buildings as they are built to fire ignition resistant standards and are well protected and defensible. If an evacuation was ordered, students would be instructed to exit the buildings and access designated buildings opened as temporary shelters. This would not be expected to include lengthy timelines as vegetation fires typically burn rapidly and it is anticipated students would be allowed back into the buildings within about 30 minutes to two hours. Larger events that require evacuation of the Project for extended durations would likely include evacuation of larger areas and traffic controls would be implemented, such as metering traffic, placing officers at intersections, opening lanes and moving people from the area.

- I17-138** The comment regards move-in/move-out events on campus. As noted in the EIR Project Description, the proposed project includes area for move-ins/move-outs on the north side of the new student housing building. Please see Final EIR Project Description, Figure 2-11 for illustration of the location.

- I17-139** The comment regards facilities for bicycles, skateboards, and pedestrians. The proposed project will include appropriate pedestrian facilities to accommodate bicyclists, pedestrians, and skateboarders in a manner consistent with applicable requirements.

- I17-140** The comment is acknowledged and appreciated. The comment incorrectly implies that SDSU had plans to develop student housing in the area of Chapultepec Hall since 2010. The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study

was incorrectly labeled as 2010 when posted on a LandLab web site. Accordingly, the correct reference year is 2013; SDSU has been informed that LandLab has corrected the error. As to the comment that the New Student Housing Project should have been included as a cumulative project in EIRs prepared since 2013, the proposed project was in the conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period. However, the comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I17-141** The comment is acknowledged and appreciated. The comment incorrectly implies that SDSU had plans to develop student housing in the area of Chapultepec Hall since 2010. The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study was incorrectly labeled as 2010 when posted on a LandLab web site. Accordingly, the correct reference year is 2013; SDSU has been informed that LandLab has corrected the error. As to the comment that the New Student Housing Project should have been included as a cumulative project in EIRs prepared since 2013, the proposed project was in the conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period. However, the comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I17-142** The comment is acknowledged and appreciated. The comment incorrectly implies that SDSU had plans to develop student housing in the area of Chapultepec Hall since 2010. The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study was incorrectly labeled as 2010 when posted on a LandLab web site. Accordingly, the correct reference year is 2013; SDSU has been informed that LandLab has corrected the error. As to the comment that the New Student Housing Project should have been included as a cumulative project in EIRs prepared since 2013, the proposed project was in the conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period. However, the comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

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## Responses to Comments – Individuals

### Comment Letter I18

5/17/2017

San Diego State University Mail - SUPPLEMENTAL Comments Student Housing Draft EIR -- COMMENTS



Laura Shinn <lshinn@mail.sdsu.edu>

#### SUPPLEMENTAL Comments Student Housing Draft EIR -- COMMENTS

1 message

gansclan@aol.com <gansclan@aol.com>  
To: lshinn@mail.sdsu.edu

Tue, May 16, 2017 at 4:35 PM

Dear Ms. Shinn,

Via my email to you earlier this week I sent a letter pertaining to the impact upon Hewlett Drive and College Gardens Court, of the proposed new student housing project. (See below.)

I now request that you please also take into account the following supplemental comments.

I have heard that some contend that the vehicular traffic pertaining to the proposed new student complex will supposedly be minimal because "freshman don't have cars." Even assuming, *arguendo*, the accuracy of the proposition that "freshman don't have cars", I believe that, nonetheless, the contention that materially increased vehicular traffic won't occur is faulty ... for the following reasons:

1. Freshman students will no doubt want to explore San Diego County. They will be visiting the beach areas, North County, downtown, shopping centers off-campus, the San Diego Zoo, Sea World, and all the many additional wonderful places in San Diego County. No doubt freshman students will visit these places --- particularly beaches, shopping centers and downtown, on multiple occasions.
2. Freshman students, if they don't have their own cars, may very well have motorcycles or scooters --- equally impactful, if not more so than cars, in terms of danger and noise.
3. Freshman students will no doubt make use of ride-sharing opportunities such as Uber.
4. Freshman students may very well have relatives who will be visiting, and be friendly with other students who either reside off-campus, or on campus at other locations, who will likely stop by the new proposed new student housing complex to visit and also provide "rides" for the freshmen.

In sum, I believe it to be naïve and much, much too simplistic to simply "write off," or ignore, or dismiss, the reality that vehicular traffic will increase due to the new student housing complex because, supposedly, "freshman don't have cars."

As noted, please take into account these supplemental comments.

<https://mail.google.com/mail/u/0/?ui=2&ik=e08d076579&view=pt&search=inbox&th=15c139dd2e048ec7&siml=15c139dd2e048ec7>

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## Responses to Comments – Individuals

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5/17/2017

San Diego State University Mail - SUPPLEMENTAL Comments Student Housing Draft EIR -- COMMENTS

**Thank you,**

**Donna Gans**

-----Original Message-----

From: gansclan <[gansclan@aol.com](mailto:gansclan@aol.com)>

To: Ishinn <[ishinn@mail.sdsu.edu](mailto:ishinn@mail.sdsu.edu)>

Sent: Mon, May 15, 2017 8:59 am

Subject: Student Housing Draft EIR -- COMMENTS

Dear Ms. Shinn,


Please see the attached letter.

(The signed original and its accompanying map has been mailed to your SDSU address.)

Thank you,

Donna Gans

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 **SDSU 2017.pdf**  
651K

<https://mail.google.com/mail/u/0/?ui=2&ik=e08d07b5795&view=pt&search=inbox&th=15c139dd2e048ec78&siml=15c139dd2e048ec7>

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### Response to Comment Letter I18

**Donna Gans**

**May 15, 2017**

- I18-1** The comment is an introduction to comments that follow. No further response is required.
- I18-2** The comment is an introduction to comments that follow. No further response is required.
- I18-3** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I18-4** The comment builds upon a prior comment, I-18-3, in which the commentator states that “some contend” the Project traffic will be minimal because “freshmen don’t have cars.” In fact, the EIR traffic analysis makes no such assumptions and applies an appropriate trip generation rate to the students who will be residing in the new housing that is based on several studies of university student housing trip generation of all classes, not just freshmen. While SDSU does not dispute the contention that freshmen students “will no doubt want to explore San Diego County,” the EIR traffic analysis allocated an appropriate number of trips to students for such exploration. Because the comment does not raise any specific issue regarding the analysis presented in the EIR, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to the decision makers before a final decision on the Project.
- I18-5** The comment states that freshman students, who don’t have cars, may have motorcycles or scooters, which are equally impactful in terms of danger and noise. Preliminarily, the number of students driving motorcycles or scooters is small relative to the number of driving cars. Please see the response to comment I-18-4 regarding the trip generation rate used as part of the EIR traffic analysis. Beyond that, no further response can be provided or is required. The comment expresses the opinions of the commentator, and will be included as part of the record and made available to the decision-makers prior to a final decision on the Project.
- I18-6** The comment states that freshman students will no doubt make use of ride-sharing opportunities, such as Uber. The traffic engineer has determined that the amount of Uber/Lyft trips during peak work commute periods, which is the relevant timeframe for assessing traffic impacts, is very small. In addition, the usage of these ride-sharing services has the effect of lowering overall trip generation since students are less likely to own a car and make trips due to the availability of these services.

## Responses to Comments – Individuals

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- I18-7** The comment states that freshman students may have other opportunities for vehicle trips from relatives, friends, etc. Please see the response to comment I-18-4 regarding the trip generation rate used by the traffic engineer to conduct the traffic analysis; the rate was determined based on several studies of student housing trip generation and includes trips by relatives, friends, etc., to the extent appropriate. Because the comment does not raise any specific issue regarding the analysis presented in the EIR, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to the decision makers before a final decision on the Project.
- I18-8** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I18-9** The comment is a conclusion to the comments presented above. No further response is required. The comments presented in above and the responses will be included as part of the record and made available to the decision makers prior to a final decision on the Project.



### Comment Letter I19

On Mon, May 22, 2017 at 11:27 PM, Ann Cottrell <[adcottrell@me.com](mailto:adcottrell@me.com)> wrote:

Dear Ms Shinn,

I absolutely agree SDSU desperately needs more on campus housing. As a resident of College View Estates I welcome some of that adjacent to “Chappy.” Phase one of the proposed project is, in general, appropriate for the location adjacent to a residential neighborhood and should be built.

I absolutely cannot understand how SDSU can conceivably think phases 2 and 3 are in any way appropriate.

1. This site (and University Towers) are the only locations adjacent to residential neighborhoods.
2. The tallest building on all of SDSU property is already inappropriately adjacent to a single family neighborhood. It is unconscionable to enlarge this travesty by building four additional dorms of the same height plus an even taller one in neighbors’ back yards
3. It destroys the only remaining wild canyon on campus. It is a technicality that SDSU managed to exempt itself from the San Diego Canyon protection regulations (of course we know that SDSU does not need to consider local regulations)

What possesses SDSU to even consider the tallest most dense development on any SDSU property to be immediately adjacent to a single family neighborhood when SDSU has identified numerous suitable alternative dorm sites which do not destroy a residential community in which many current and retired faculty staff as well as many alumni and current students live.

The attached makes clear that a number of sites SDSU identified as possible just a year and a half ago as locations for new dorms meet the stated criteria and are preferable in many ways to Remington phase 2 & 3.

Please think seriously about these alternatives which truly are better locations for the beds in Remington 2 & V#.

Sincerely,

Ann Cottrell, SDSU faculty emerita and CVE resident

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### Response to Comment Letter I19

**Ann Cottrell**

**May 22, 2017**

- I19-1** The comment is acknowledged and appreciated. The comment expresses general support for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I19-2** The comment is acknowledged and appreciated. The comment expresses general support for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I19-3** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I19-4** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I19-5** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I19-6** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I19-7** See response to comment I5-5.
- I19-8** The comment is acknowledged and appreciated. As a state agency, CSU/SDSU is not subject to local government planning, such as the City of San Diego General Plan. Accordingly, because such local land use plans are not applicable to CSU/SDSU, an

## Responses to Comments – Individuals

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analysis with respect to the General Plan's zoning and permits requirements is not required under CEQA. For that reason, no further response is required.

- I19-9** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I19-10** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I19-11** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

## Responses to Comments – Individuals

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### Comment Letter I20

From: <[tshirley@cox.net](mailto:tshirley@cox.net)>  
Date: Wed, May 24, 2017 at 3:44 PM  
Subject: Support for New Student Housing  
To: [ishinn@mail.sdsu.edu](mailto:ishinn@mail.sdsu.edu)  
Cc: [gina.jacobs@mail.sdsu.edu](mailto:gina.jacobs@mail.sdsu.edu)

Hello Laura,

My wife and I have lived in the College Area for the past thirteen years. We reside in the College East Area on Reservoir Drive.

I'm currently a CACC Board Member and Chair of the Mesa Colony Community Group. I know you've received a lot of input in to the student housing project near Chappy, and my wife and I would like to add our voices support for the project. The community has long-wished to see more student housing on campus to reduce the impact on local residential housing and this helps greatly in that regard.

As far as a recommendation for improvement, if you could direct student drop-off traffic for loading and unloading off Remington Road completely, it would mitigate a lot of the concern that has been voiced. I recall you have supply unloading in the back of the buildings on Remington with access from 55th. If you could somehow have a student loading and unloading location for the complex in a similar location off 55th, I think it would help reduce some of the concern of residents in CVE.

Overall, the project will go a long way in making SDSU more of a residential campus with amenities onsite. Hopefully soon, we'll begin to see offsite amenities for students and residents within walking distance of campus. As an SDSU alum, I look forward to seeing this positive change.

Thanks so much!

Terry and Annie Shirley  
5181 Reservoir Drive  
San Diego, CA 92115  
[619-303-0788](tel:619-303-0788)  
[619-846-3357](tel:619-846-3357) Mobile

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**Response to Comment Letter I20**

**Terry and Annie Shirley**

**May 24, 2017**

- I20-1**      The comment is an introduction to comments that follow. No further response is required.
- I20-2**      The comment is an introduction to comments that follow. No further response is required.
- I20-3**      The comment is acknowledged and appreciated. The comment expresses general support for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I20-4**      The comment addresses general subject areas, which received extensive analysis in the Draft and Final EIR. The Project's impacts relative to Remington Road and on campus move in were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I20-5**      The comment addresses general subject areas, which received extensive analysis in the Draft and Final EIR. The Project's impacts relative to 55th Street were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I20-6**      The comment is acknowledged and appreciated. The comment expresses general support for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.

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## Responses to Comments – Individuals

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### Comment Letter I21

From: **Malcolm Shearer** <[malcolm.shearer@hotmail.com](mailto:malcolm.shearer@hotmail.com)>  
Date: Wed, May 24, 2017 at 5:43 PM  
Subject: Aztec Canyon  
To: "[Ishinn@mail.sdsu.edu](mailto:Ishinn@mail.sdsu.edu)" <[Ishinn@mail.sdsu.edu](mailto:Ishinn@mail.sdsu.edu)>

I'm a recent graduate from SDSU. I believe you should look at different sites for building new student housing. I also believe it's ghetto to not think twice about the animals in Aztec Canyon. Please choose a different site. Thank you.

Malcolm Shearer

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## **Response to Comment Letter I21**

**Malcolm Shearer**

**May 24, 2017**

- I21-1** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I21-2** See response to comment I5-5.
- I21-3** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

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### Comment Letter I22

On Thu, May 25, 2017 at 9:34 PM, Jean Hoeger <[kjhoeger@cox.net](mailto:kjhoeger@cox.net)> wrote:  
I want to voice my opinion against Phase 2 and 3 of the new dorm project

- 1) The project's apparent concealment, with significant university work in 2010 and then 2013 on the project, but no disclosure to the public or inclusion in Cumulative Impacts of any EIR
- 2) The bias of the objectives toward 1 site, including a preference for adjacency to Chappy, the use of undeveloped land, no redevelopment, etc.
- 3) The availability of other sites, including 2400 beds in already certified EIRs and SDSUs own work for 1400 beds in the Chappy parking lot, instead of the 800 proposed
- 4) The biological significance, the multispecies habitat and the fire hazards of the canyon as a site
- 5) The canyon destruction by SDSU
- 6) Honor and enforce President Hirshman's public declaration of refocusing the project

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There are a number of other sites that can be built upon with destroying the canyon

I I22-7

Jean Hoeger

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## **Response to Comment Letter I22**

**Jean Hoeger**

**May 25, 2017**

- I22-1** The comment is acknowledged and appreciated. The comment incorrectly implies that SDSU had plans to develop student housing in the area of Chapultepec Hall since 2010. The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study was incorrectly labeled as 2010 when posted on a LandLab web site. Accordingly, the correct reference year is 2013; SDSU has been informed that LandLab has corrected the error. As to the comment that the New Student Housing Project should have been included as a cumulative project in EIRs prepared since 2013, the proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period. However, the comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I22-2** With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I22-3** With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

## Responses to Comments – Individuals

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**I22-4** With respect to the comment regarding the canyon ecosystem, see response to comment I5-5.

The Project's Fire Hazards were analyzed in the Fire Fuel Load Modeling Report (Dudek 2017). Based on the results of that evaluation, fire safety measures were developed to protect the proposed structures from wildfire threats, enable fire department access, and provide a defensible project. The Canyon is considered to include the potential for wildfire and that potential has been addressed through project design features and measures above and beyond code requirements. Please also refer to response to comment I-17-30 for additional details on Project requirements for constructing in a VHFHSZ.

**I22-5** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.

**I22-6** The comment seeks a commitment that the decision makers will “honor and enforce President Hirshman’s public declaration of refocusing the project” with respect to Phases II and III of the Project. The comment regarding President Hirshman’s May 8, 2017 statement is noted. In response to the statement and following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I22-7** With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.



## Responses to Comments – Individuals

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### Comment Letter I23

On Sat, May 27, 2017 at 7:56 AM, Andy Cretcher <[acretcher@gmail.com](mailto:acretcher@gmail.com)> wrote:  
Laura Shinn,

I am writing you to formally protest the proposed construction of student housing on Aztec Canyon. This land is protected under an agreement between the state and the city of San Diego, and should not be disturbed. As a resident of San Diego, and College View Estates, I implore you to PLEASE, DO NOT BUILD in Aztec Canyon. This canyon is one of the last natural and protected places in this area and although it may go unnoticed, it is EXTREMELY important to the health of our city, our neighborhood, the many species of plants and animals that live there, and to me personally.

I say again, DO NOT BUILD in Aztec Canyon! To do so would be a temporary solution to your problems at the university that would have negative repercussions for the city, the neighborhood, and all of us forever.

Thank You,

Andy Cretcher  
5340 Redding Rd  
San Diego CA 92115

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**Response to Comment Letter I23**

**Andy Cretcher**

**May 27, 2017**

- I23-1** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I23-2** While not a signatory to the MSCP, SDSU conformed to the City of San Diego Land Use Adjacency Guidelines of the Multiple Species Conservation Program (MSCP) because the property is adjacent to land that is designated as preserve.
- I23-3** With respect to the comment regarding the canyon ecosystem, see Biological Resources Thematic Response, which states that the Project has been modified and Phases II and III will not be developed. Phase III included the most impacts to the canyon. Phase I is still proposed as part of the Project and does not impact the canyon. With these modifications, the Project will not result in significant unavoidable impacts, and all environmental impacts will be mitigated to less than significant.
- I23-4** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.

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## Responses to Comments – Individuals

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### Comment Letter I24

On Mon, May 29, 2017 at 7:00 AM, Sara Ellis <[sm\\_napier@yahoo.com](mailto:sm_napier@yahoo.com)> wrote:

Why cannot you tear down one of the old dorms on 55th or on campus and build a high rise dorm?

The students will be closer to the center of campus and you will be replacing old dorms and be able to house many more students then the 2 or 3 story dorms from the 60's? Being closer to the center of campus will allow the students to be closer to the cafeteria.

How can you allow the machines to invade the habitat of others now a days when our schools are teaching save the habitats. Sit in on a 3rd grade classroom curriculum and listen. Don't pollute the oceans and don't destroy the canyons.

There is no excuse to kill!!!! Putting, relocating, animals to another area for wildlife living is not a solution. Many were killed with intruding on their homes.

I am the Lorax and I speak for the Trees and animals...

Listen before it tis too late, choose another area and it will be a Win Win solution!!!

Thank you,  
Sally Ellis, former teacher and believer in brainstorming to find the best solution...Not always the easiest!!!  
Please don't take the habitat.

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## **Response to Comment Letter I24**

**Sally Ellis  
May 29, 2017**

- I24-1** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I24-2** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I24-3** With respect to the comment regarding the canyon ecosystem, see Biological Resources Thematic Response, which states that the Project has been modified and Phases II and III will not be developed. Phase III included the most severe impacts to the canyon. Phase I is still proposed as part of the Project and does not impact the canyon. With these modifications, the Project will not result in significant unavoidable impacts, and all environmental impacts will be mitigated to less than significant.
- I24-4** See response to comment I24-3.
- I24-5** See response to comment I24-3.
- I24-6** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close

## Responses to Comments – Individuals

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of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I24-7**      The comment is a conclusion to previous comments. No further response is required.



## Responses to Comments – Individuals

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### Comment Letter I25

On Mon, May 29, 2017 at 9:35 AM, Kathleen Veinbergs <[kathleenveinbergs@gmail.com](mailto:kathleenveinbergs@gmail.com)>  
wrote:  
PLEASE SAVE OUR CANYON!!!

I I25-1

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**Response to Comment Letter I25**

**Kathleen Veinbergs**

**May 29, 2017**

**I25-1**      The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.

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### Comment Letter I26

**From:** siri jostad <[sirijostad@gmail.com](mailto:sirijostad@gmail.com)>  
**Date:** May 29, 2017 at 6:58:36 PM PDT  
**To:** [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)  
**Cc:** [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu), [TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffr@mail.sdsu.edu](mailto:PresOffr@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)  
**Subject:** Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter "Aztec Canyon") directly west of Chapultepec Hall. SDSU withheld this project from the public until December 2016, and failed to disclose this "reasonably foreseeable" project in the cumulative impacts of environmental analyses and EIRs conducted since 2010. SDSUs DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment. The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA: 1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSUs own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSUs DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection. 2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSUs Sophomore Success Program. SDSUs

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west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment. 3. Environmental Justice dictates that the DEIR's Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning. 4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus. 5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only. 6. SDSU's biological survey of Aztec Canyon was limited and incomplete.

↑ I26-8  
Cont.

I26-9

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I26-13

↓ I26-14

and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing; or otherwise are considered sensitive." SDSUs brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon. 7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon. 8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSUs construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption. 9. SDSUs analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSUs Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the "fan shape" of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west.

I26-14  
Cont.

I26-15

I26-16

I26-17

I26-18

## Responses to Comments – Individuals

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Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts. 10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts. Sincerely,

Siri Kay Jostad  
4202 Biona Place  
San Diego CA 92116

[siri@gardencompass.com](mailto:siri@gardencompass.com)

Resident of Kensington  
Someone who cares about the canyons that are the hallmark of the City of San Diego and the last refuges for already restricted wildlife and botany

NOTE: [TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu) instructions are DISTRIBUTE TO ALL CSU TRUSTEES AND ALTERNATES.

↑ I26-18  
Cont.  
I26-19  
I26-20



## **Response to Comment Letter I26**

**Siri Kay Jostad**

**May 29, 2017**

**I26-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the Project was in the conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I26-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I26-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I26-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I26-5** Please see response to I26-4.
- I26-6** Please see response to I26-4.
- I26-7** Please see response to I26-4.
- I26-8** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I26-9** Please see the Biological Resources Thematic Response for information responsive to this comment.
- I26-10** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I26-11** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca

## Responses to Comments – Individuals

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Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.

**I26-12** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.

**I26-13** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.

**I26-14** The Biological Resources section of the Draft EIR, Section 4.3, specifically address all special-status species, including the potential for state- and federally listed endangered and threatened birds to occur on site. The Draft EIR specifically describes the potential for coastal California gnatcatcher, a federally listed threatened species, to occur as well as the results of the focused protocol surveys. Additionally, as specified on Table 4.3-1 on page 4.3-2 of the Draft EIR, all of the biological surveys were conducted in 2014 and again in 2017. The results of the first plant survey done in 2017 were included in the Draft EIR (see p. 4.3-9) and the results of the June 2017 plant survey are described in the Biological Resources Thematic Response. No additional special-status plants were observed during the June 2017 survey. A more detail assessment of each special-status wildlife and plant species potential to occur is described in Appendices D1 and D2 of Appendix D to the Draft EIR.

The Draft EIR analyzes impacts associated with construction in the canyon. However, since the Draft EIR was released for public review the Project has been modified to remove Phases II and III. As stated in Biological Resources Thematic Response, Phases II and III will not be developed and therefore will eliminate impacts to the canyon. Phase I is still proposed as part of the Project and does not impact the canyon. With these modifications, the Project will not result in significant unavoidable impacts, and all environmental impacts will be mitigated to less than significant.

Also, see Biological Resources Thematic Response, which describes the California gnatcatcher observed at the Residential Block 701 Undergrounding Utility District Project, located approximately 0.5 mile west and several canyons away from the Project site, in March 2017. Potential noise impacts to California gnatcatcher, if observed during pre-construction surveys, are mitigated through mitigation measure MM-BIO-6, which states that pre-construction surveys for California gnatcatcher shall be conducted, and if found nesting, on-site noise reduction techniques shall be implemented to ensure that construction noise levels do not exceed 60 A-weighted decibels  $L_{eq-h}$  at the nest location. Additionally, nest buffers are described in mitigation measure MM-BIO-1. The nest buffers are established, in part, to help reduce noise impacts to nesting birds.

- I26-15** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR the Project has been modified to remove Phases II and III, ensuring no impacts to biological resources would occur in the canyon. The comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I26-16** The comment claims that the non-renewable energy use associated with Project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation do not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment apply do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.
- I26-17** The comment claims that the non-renewable energy use associated with Project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation do not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing. The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The project also does not use “unusual levels” of energy. The carbon

reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

- I26-18** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,” and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the traffic noise analysis has no connection with the ambient noise levels measured.

Although the noise measurements conducted on January 16 fairly represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are located in Appendix N-1. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. As shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly

## Responses to Comments – Individuals

attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, any such effects are no longer a concern because the proposed project has been modified and SDSU no longer plans to pursue the development of Phases II and III, so no further response to this comment is necessary.

- I26-19** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. Because the proposed project has been modified and no longer includes Phase III, there will be no significant and unavoidable traffic impacts. Please see Final EIR, Preface, for additional information regarding the project modifications. As to the comments regarding greenhouse gases and criteria pollution, EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

## Responses to Comments – Individuals

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**I26-20** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. Because the proposed project has been modified and no longer includes Phase III, there will be no significant and unavoidable traffic impacts. Please see Final EIR, Preface, for additional information regarding the project modifications. As to the comments regarding greenhouse gases and criteria pollution, EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

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## Responses to Comments – Individuals

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### Comment Letter I27

On Mon, May 29, 2017 at 2:15 PM, Charles Sloan <[chuksln@aol.com](mailto:chuksln@aol.com)> wrote:

We need to preserve the wildlife and 85 plant species here!

I I27-1

Build your dorms elsewhere!

I I27-2

We have lived here since the house was brand new and want to preserve the area!

I I27-3

Higher education is not necessary because there are no jobs!  
Sent from my iPhone7

I I27-4

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**Response to Comment Letter I27**

**Charles Sloan**

**May 29, 2017**

- I27-1** With respect to the comment regarding the canyon ecosystem, see Biological Resources Thematic Response, which states that Phases II and III will not be developed. Phase III included the most severe impacts to the canyon. Phase I is still proposed as part of the Project and does not impact the canyon. With these modifications, the Project will not result in significant unavoidable impacts, and all environmental impacts will be mitigated to less than significant.
- I27-2** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I27-3** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I27-4** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

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## Responses to Comments – Individuals

### Comment Letter I28

**Subject:** Proposed Aztec Canyon Building Plan

**Date:** Tue, 30 May 2017 09:43:27 -0700

**From:** Jim Corrigan <[jpdrover@cox.net](mailto:jpdrover@cox.net)>

**To:** [lshinn@mail.sdsu.edu](mailto:lshinn@mail.sdsu.edu)

**CC:** [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu),  
[PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

From:

James Corrigan  
Patrick Hanson  
5443 Drover Drive  
San Diego, CA 92115  
[JPDrover@Cox.net](mailto:JPDrover@Cox.net)

To:

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

May 30, 2017

[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

We have been residents of College View Estates since 1995 and have proudly watched SDSU grow in both size and academic quality. We remain loyal supporters. We strongly support SDSU's decisions to build additional on campus student housing and requiring sophomore's to live on campus. However, we are seriously troubled and concerned by both the process and the content of University's recently unveiled plans to build additional student housing in the "Aztec Canyon" near Chapultepec Hall. This is an appalling decision on the part of the University because of its (1) lack of respect for the environment with the damage that this would cause a biologically sensitive, high fire hazard canyon, and (2) the lack of respect that SDSU has shown its neighbors many of who are current or retired faculty members and loyal supporters.

This is further troubling given that since at least 2010, SDSU has had plans for six dorm towers and has withheld this project from the public until December 2016, and failed to disclose this

I28-1

I28-2

I28-3

I28-4

## Responses to Comments – Individuals

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“reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010. We believe that SDSU’s DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of what has felt like community manipulation and the insufficiency of the DEIR, SDSU now proposes to approve a project that includes significant environmental impacts that have feasible alternatives. We strongly believe that the insufficiencies of the DEIR must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA.

We further strongly believe that;

- (1) SDSU must delay its aggressive fall of 2017 project construction start date in order to reduce or remove environmental damages.
- (2) SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs.
- (3) SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.
- (4) SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students
- (5) SDSU’s biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU’s Sophomore Success Program
- (6) SDSU’s west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU’s Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired “solution” of SDSU that has been “in search of a problem.” SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.
- (7) SDSU’s significant traffic impacts are unacceptable. They must be fully mitigated or the project must be revised until traffic impacts are less than significant.

I 128-4  
Cont.

I 128-5

I 128-6

I 128-7

I 128-8

I 128-9

I 128-10

I 128-11

I 128-12

I 128-13

I 128-14

I 128-15

## Responses to Comments – Individuals

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It is our hope that San Diego State will be a responsible care taker of the environment, a model of social responsibility for its students, and a good neighbor by proceeding in a respectful process as it carves out its future.

I 28-16

Sincerely,

James Corrigan  
College View Estates Resident  
Retired Manager of Spiritual Care and Clinical Pastoral Education, Sharp HealthCare

Patrick Hanson  
College View Estates Resident  
Retired Manager of Quality Improvement, Vitas Innovative Hospice Care

CC: [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu), [TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu),  
[PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

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**Response to Comment Letter I28**

**James Corrigan and Patrick Hanson**

**May 30, 2017**

- I28-1** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I28-2** With respect to the comment regarding the canyon ecosystem, see Biological Resources Thematic Response, which states that Phases II and III will not be developed. Phase III included the most severe impacts to the canyon. Phase I is still proposed as part of the Project and does not impact the canyon. As explained in the Final EIR, the proposed project has been modified to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. With these modifications, the Project will not result in significant unavoidable impacts, and all environmental impacts will be mitigated to less than significant.
- Please refer to response to comments I-17-30 and I-44-4.
- I28-3** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I28-4** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the Project was in the conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period.

## Responses to Comments – Individuals

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As to the comment regarding biology and fire hazards, as identified in the Project's Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project's new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I28-5** Please refer to response to comment I28-4.

**I28-6** Please refer to response to comment I28-4.

**I28-7** The comment claims SDSU must delay the construction start date of the New Student Housing project "in order to remove environmental damages." The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding "non-mitigable and irreversible impacts," following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I28-8** The California State University Board of Trustees' prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.

## Responses to Comments – Individuals

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- I28-9** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The proposed Project has been modified to eliminate Phases II and III. In addition, the Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed Project on Biological Resources, including specifically the referenced canyon. The analysis correctly determined that all potential environmental impacts would be mitigated to less than significant. The comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I28-10** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I28-11** Please refer to response to comment I26-14.
- I28-12** Please refer to response to comment I26-14.
- I28-13** Please refer to response to comment I28-4.
- I28-14** Please refer to response to comment I28-4.
- I28-15** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. Because the proposed Project has been modified and no longer includes Phase III, there will be no significant and unavoidable traffic impacts. Please see Final EIR, Preface, for additional information regarding the project modifications. As to the comments regarding greenhouse gases and criteria pollution, EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project’s vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I28-16** The comment is a conclusion statement referencing previous comments. No further response is required.

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### Comment Letter I29

From: **Susan Pitney** <[suelou@pitney.us](mailto:suelou@pitney.us)>  
Date: Mon, May 29, 2017 at 10:12 PM  
Subject: Formal Comments for SDSU DEIR (4/21/17)  
To: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)  
Cc: [TWhite@calstate.edu](mailto:TWhite@calstate.edu), [TrusteeSecretariat@calstate.edu](mailto:TrusteeSecretariat@calstate.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu),  
[PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

Susan Pitney  
6443 Rancho Park Drive  
San Diego, CA 92120

29 May 2017

TO: Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624

Dear Ms. Shinn,

As a university member of the San Diego State administration, I truly hope you will read and act upon the following notes that show very negative effects of the proposed dormitory towers as they are now proposed.

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter "Aztec Canyon") directly west of Chapultepec Hall. SDSU withheld this project from the public until December 2016, and failed to disclose this "reasonably foreseeable" project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of

I29-1

I29-2

I29-3

I29-4

I29-5

## Responses to Comments – Individuals

Maya/Olmeca Halls for 1600 beds and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSUs DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I29-5  
Cont.

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSUs Sophomore Success Program. SDSUs west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSUs Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I29-6

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSUs website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I29-7

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I29-8

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSUs own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I29-9

## Responses to Comments – Individuals

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6. SDSUs biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing; or otherwise are considered sensitive." SDSUs brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I29-10

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I29-11

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSUs construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption.

I29-12

9. SDSUs analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSUs Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the "fan shape" of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I29-13

10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets.

I29-14

## Responses to Comments – Individuals

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SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

Sincerely,  
Susan Pitney

↑ I29-14  
| Cont.



**Response to Comment Letter I29**

**Susan Pitney**

**May 29, 2017**

**I29-1** The comment is an introduction to comments that follow. No further response is required.

**I29-2** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the Project was in the conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I29-3** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. For a review of the sufficiency and feasibility of alternatives, please see Alternatives Thematic Response. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

## Responses to Comments – Individuals

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- I29-4** The comment is an introduction to comments that follow. No further response is required.
- I29-5** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I29-6** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I29-7** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I29-8** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I29-9** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I29-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and

irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis correctly determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR the Project has been modified to remove Phases II and III, ensuring no impacts to biological resources would occur in the canyon. The comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I29-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 Energy and Appendix F of the Draft EIR, the energy use expected from project construction and operation do not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing. The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5 Energy, 4.7 Greenhouse Gas Emissions, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I29-12** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation do not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be

incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing. The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California's carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project's operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The project also does not use "unusual levels" of energy. The carbon reductions cited in the comment refer to those outlined in the State's Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

- I29-13** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the "constructive interference of the proposed Phase III building design," and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the traffic noise analysis has no connection with the ambient noise levels measured.

## Responses to Comments – Individuals

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Although the noise measurements conducted on January 16 fairly represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. As shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, any such effects are no longer a concern because the proposed project has been modified and SDSU no longer plans to pursue the development of Phases II and III, so no further response to this comment is necessary.

- I29-14** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. Because the proposed project has been modified and no longer includes Phase III, there will be no significant and unavoidable traffic impacts. Please see Final EIR, Preface, for additional information regarding the project modifications. As to the comments regarding greenhouse gases and criteria pollution, EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

### Comment Letter I30

Bill & Halina Brophy  
5209 Stone Court  
San Diego, CA 92115  
bbrophy@cox.net

May 30, 2017

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

#### Greetings:

As a native born San Diegan, an SDSU alumni, a supporter of KPBS and SDSU Athletics, and a homeowner in College View Estates for 20 years, I am writing to join the college area community in opposing Phase 2 and 3 of the Chapultepec Hall dormitory expansion. This is a massive 3-phase dorm project. Phase 1 would be built on an existing parking lot - we all agree with this. Phase 2 and 3 are of massive scale and would be built in the canyons west of the very tall dorms and would actually be taller. We are opposed to this. I agree that SDSU needs more dorms on campus, but there are at least 14 other sites where these could be built. Any of these options would be a better choice than building in an undeveloped, biologically sensitive, very high fire hazard canyon adjacent to our neighborhood. This project, as currently planned, would create the following problems.

I30-1

**TRAFFIC** There are only two road accesses to our neighborhood: Yerba Santa Drive to Montezuma Road, and Remington Road to 55<sup>th</sup> Street. Both accesses are single lane each way. To place such a large number of student residences (2,600 beds) concentrated in one spot on Remington will result in significant congestion from pick-up and drop-off traffic, huge traffic problems at the beginning and end of each semester, and increase the parking problems that we are already experiencing in our neighborhood. SDSU's significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In a demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU declares that its project is more important than the community's cumulative rights and interests, and does not address the health impacts of surrounding residents who will breathe the emissions from increased, slower moving traffic and the impacts on state of California greenhouse gas targets.

I30-2

**NOISE** Noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. SDSU's analysis of noise impacts is inadequate. According to SDSU's Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences, or to use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the "fan shape" of the proposed Phase III construction.

I30-3

## Responses to Comments – Individuals

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**ENVIRONMENTAL** Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. SDSU's brief survey was insufficient and fails to identify the known species that, whether or not discovered in this particular limited time study, are likely to continue to inhabit Aztec Canyon. As a result, SDSU must conclude that any destruction of Aztec Canyon while redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.

I30-4

Apparently, SDSU recognized that the expansion plan was problematic. SDSU has had plans for six dorm towers in the Aztec Canyon since at least 2010, and wants to break ground in the fall of 2017, but withheld this project from the public until December 2016, and failed to disclose this "reasonably foreseeable" project in the cumulative impacts of environmental analyses and EIRs conducted since 2010. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts.

I30-5

SDSU alone chose to withhold this project until the 11<sup>th</sup> hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and should not be allowed to give the environment short shrift to correct its own timing error. If SDSU wants to build a 2,600 bed, \$0.5 BILLION project, it should build in time for environmentally responsible site selection.

Among alternatives, SDSU should consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I30-6

SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. Lot U must be considered for maximum density construction only.

I30-7

Thank you for the opportunity to provide my comments. I am hopeful that SDSU will listen to and respect our community's concerns and needs.

Sincerely,

Bill Brophy

CC: [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu), [TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)



### Response to Comment Letter I30

**Bill Brophy**  
**May 30, 2017**

- I30-1** The comment is an introduction to comments that follow. No further response is required.
- I30-2** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. Because the proposed project has been modified and no longer includes Phase III, there will be no significant and unavoidable traffic impacts. Please see Final EIR, Preface, for additional information regarding the project modifications. As to the comments regarding greenhouse gases and criteria pollution, EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project’s vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I30-3** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,” and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results.

## Responses to Comments – Individuals

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Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the traffic noise analysis has no connection with the ambient noise levels measured.

Although the noise measurements conducted on January 16 fairly represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. As shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, any such

## Responses to Comments – Individuals

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effects are no longer a concern because the proposed project has been modified and SDSU no longer plans to pursue the development of Phases II and III, so no further response to this comment is necessary.

**I30-4** Please refer to response to comment I26-14.

**I30-5** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the Project was in the conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I30-6** Information regarding the alternatives is provided in the Alternatives Thematic Response.

**I30-7** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.

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### Comment Letter I31

Laura Shinn, Director  
Facilities Planning, Design and Construction  
Business and Financial Affairs  
San Diego State University  
5500 Campanile Drive  
San Diego, CA 92182-1624  
lshinn@mail.sdsu.edu

Re: My Response To The Draft EIR for Dormitory Complex Centered Around Chapultepec Residence Hall

May 31, 2017

Dear Ms. Shinn and The California State University Board Of Trustees,

I am a long-time home owner in the College Area.

I deeply appreciate SDSU desire to provide more on-campus student housing. This will benefit both SDSU by way of helping students graduate and also by helping the College Area community control mini-dorms.

I support the Phase 1 dorms of the proposed Chapultepec area for some of the new on-campus dorms. However, 1 and others feel that Phases 2 and 3's canyon site is one of the worse sites to build on. Below are my main objections to building Phases 2 and 3 in the Chapultepec canyon area, and my support instead for building dorms on the 55<sup>th</sup> St. site..

I31-1

#### **San Diego's "Sacred" Canyons:**

One obvious objection is the building into the Chapultepec canyon itself. Canyons, to many San Diegans, are almost sacred open spaces, that make us unique among many other cities. The City of San Diego web site states that: "San Diego's canyons contain natural and cultural history unique to our region. For many communities these canyons are all that remain as undeveloped natural landscape. Canyons provide the citizens of San Diego with such benefits as scenic vistas, preservation of natural resources, outdoor recreation, and other benefits to health and wellbeing.

I31-2

"The City of San Diego Park & Recreation Department's Open Space Division manages over 24,000 acres of open space, including open space canyons and parklands. Some 3,200 acres are citywide neighborhood canyons and parklands which are overseen by the Open Space Canyon Program staff.

"The Open Space Division Canyon Program supports various "Friends of Canyons" groups by assisting with environmental education, canyon enhancement planning, weed management, trail maintenance, and kiosk installation."

One of these "Friends of Canyons" groups is the San Diego Canyonlands group. Their web site states: "San Diego is unique as a major metropolitan area with natural open spaces, including hundreds of canyons and stretches of creek habitats scattered throughout the urban environment. These canyons, these islands of open space, are like mini-regional parks in our back yards. They play an important role in our wellness through filtration of air and water, serving as our City's kidneys & lungs.

I31-3

"San Diego Canyonlands works towards preserving and restoring our canyons and influence policies towards their protection. We are also committed to fostering opportunities to utilize our Canyons as "Nature Classrooms" where San Diego's youth can learn about our unique wildlife and eco-systems with hands-on experiences. We promote passive recreational use in San Diego's urban wildlands."

Also, destroying this canyon would greatly injure SDSU's environmental standing in the nation. Photos of before and during canyon construction may be posted on various social media sites, further damaging SDSU's reputation. This canyon destruction goes against all that SDSU espouses in its campus-wide sustainability and greening programs and its Environmental Studies classes and majors. I'm pleased that President Hirschman appears to understand this potential disaster, and, hopefully, will not allow building in the canyon. I also hope that when Sally Roush becomes interim president that she too will support preserving this canyon.

131-4

### 55th Street Alternative

I propose that an alternative solution would be to instead build dorms on the blocks at the end of 55<sup>th</sup> Street, known as the "Albert's Apartments" area. This area is located on the finger-mesa just to the east of the Chapultepec area. The best view of this area is on the map in Figure 2.2 in Section 2 "Project Description". This area is immediately northeast of the proposed site, outside of the area designated as SDSU property. This map is actually misleading because almost all of 55<sup>th</sup> St. is owned by Aztec Shops Ltd., "an auxiliary of San Diego State University". This area should be designated with at least a dotted red line around it to indicate that it is actually part of SDSU via Aztec Shops Ltd. (more about this in "My Response - 1," below).

131-5

Currently, there are only 770 tenants in this under-utilized area. This is a great waste of potential space, where large 25+ floor dorms could be built which could contain many more thousands of tenants (as next described).

### 55th Street Alternative – number of beds in Phases 2 & 3 (1716) vs 55<sup>th</sup> St. (10,500-13,125)

On page 2.10 are listed a table of the details of the proposed Chapultepec dorms. Phase 1 is accepted by all parties. Therefore, only Phases 2 and 3 are in question. In Phase 2 there are 850 beds on 13 floors. In Phase 3 there are 866 beds distributed on 36 floors (4 9-floor wings). Therefore, the total for Phases 2 and 3 are 1716 beds on 49 floors. That is approximately 35 beds per floor.

131-6

Using the above figures, one 25 floor building on the alternate 55<sup>th</sup> St. site would contain 875 beds (25 floors X 35 beds per floor). Therefore, only 2 25-floor dorms on the alternate 55<sup>th</sup> St. site would contain 1716 beds – which equals the total number of beds on the proposed combined Phases 2 and 3 sites. A total of 12-15 25-floor dorms could be built on 55<sup>th</sup> St. That's a total of 10,500 – 13,125 beds for the alternate site of 55<sup>th</sup> St. That's many more students that could improve their education and SDSU's graduation rate.

### 55th Street Alternative – additional advantages

I suggest some additional advantages of building on this 55<sup>th</sup> St. site as opposed to the proposed Chapultepec site:

1. Dorms could be built 25+ floors high, housing thousands more students than at the proposed Phases 2 and 3 sites, as shown above:
  - a. If there currently aren't funds for all the tall dorms, then build the dorms in phases as funds become available in the future.
  - b. Housing for the 770 current 55<sup>th</sup> St. tenants during demolition and construction of the 55<sup>th</sup> St. dorms could be accomplished by first moving the 770 55<sup>th</sup> St. students into the 850 bed Phase 1 dorm with 80 new students. Then begin building the 25+ floor 55<sup>th</sup> St. dorms in phases. They would be filled as they are completed. Construction could start from the south end and then continue northwards, so students wouldn't have to walk in the construction zone. Any moving of students during construction/remodeling could be similar to what happened during the recent renovation of some dorms on East Campus.
2. This area could be a great "student village", that would be car-free. Only bikes and skateboards would be allowed. The Phase 1 dorms would join Chapultepec with 55<sup>th</sup> St., preventing Chapultepec from being isolated.

131-7

131-8

3. 55<sup>th</sup> St. could be a mixed-use student area, with various student-oriented retail stores, indoor recreational areas, restaurants, entertainment venues, etc. built on the first floor of the dorms, similar to South Campus Plaza.
4. An emergency road could be built around behind the dorms near the canyon edge, with access only to emergency vehicles. A paved road for only emergency vehicles could also be built where the current road is, down the middle of 55<sup>th</sup> St., for emergency access to building fronts.
5. Parking for any resident or visitor vehicles could be provided in the existing “Pit” parking lot, just to the east of these 55<sup>th</sup> St. dorms. If needed, a parking structure could be built in the Pit, around the existing trolley tracks. Other parking could be in the existing parking structure next to the Pit.
6. Pedestrian access to Pit parking from these new 55<sup>th</sup> St. dorms could be provided by a pedestrian bridge from the new 55<sup>th</sup> St. dorms to the Pit. Elevators might be required if no parking structure is built in the Pit.
7. The back of the dorms on the west side would act as a noise barrier for the residents on Hewlett Dr. and Remington Road.

The small amount of land that is private property could be either purchased outright or negotiated as a public-private joint arrangement to tie in with the rest of this area, somewhat similar to the arrangement the private builder made with SDSU for the apartments on 5030 College Ave.

### My Response To The Draft EIR’s Objections To The 55th Street Alternative

The Draft EIR’s objections to the 55<sup>th</sup> St. site are in Section 6, pgs. 3-4. The Draft EIR’s objections are copied below in items 1 to 8 in black. **My responses, using some of my comments above, are in red.**

1. This alternative (55<sup>th</sup> St.) would consist of demolishing and redeveloping the existing student housing currently located on the 55th Street site. Although all but one of the 55th Street Peninsula properties are owned by Aztec Shops, an affiliate of SDSU, Aztec Shops is a 501C3 organization and the property would have to be transferred to the state.  
**The following quoted phrases are from the web site of Aztec Shops Ltd.**  
**“Aztec Shops, Ltd. is a non-profit corporation that functions primarily as an auxiliary of San Diego State University. The corporation provides...operation of ...Residential Real Estate properties surrounding campus.”**  
**“As a ‘self-sustaining’ non-profit SDSU auxiliary, Aztec Shops operates without subsidy from the University or the State. Net revenue from operations is contributed back to the University....In addition, Aztec Shops contributes...monies each year in accordance with the University’s Strategic Plan, ‘Building on Excellence’.”**  
**“In Fiscal Year 2016 ... Aztec Shops directed \$3.5 million to the University through rent”, etc. In addition, Aztec Shops contributed \$765,000 to Campus... The total amount sent from Aztec Shops to the University in Fiscal Year 2016 was approximately \$4.3 million.”.**  
**As can be seen, since Aztec Shops Ltd.’s function is to support SDSU, its ownership of almost all of 55<sup>th</sup> St. is for the benefit of SDSU in the future. And this future is now. This is a once-in-a-lifetime opportunity for SDSU to develop 55<sup>th</sup> St. to its full potential by creating a West Campus village with many dorm residences and shops for its students. If not now, when?**
2. Additionally, demolition of the existing student housing, which presently provides housing for approximately 770 students, would result in the loss of these beds from the campus inventory and, as a result, the first 850 beds to be constructed would merely provide replacement housing and only add 80 beds to the current inventory; that is, SDSU would need to construct 3,336 beds in order to achieve an increase of 2,566 beds. Demolition and redevelopment also would negatively impact current student bed capacity and displace student residents during the nearly three-year construction period. Additionally,



## Responses to Comments – Individuals

the 770 existing beds are a critical component of SDSU's second year phasing proposal regarding campus live-on requirements.

**As mentioned above, housing for the 770 current 55<sup>th</sup> St. tenants during demolition and construction of the 55<sup>th</sup> St. dorms could be accomplished by first moving the 770 55<sup>th</sup> St. students into the 850 bed Phase 1 dorm with 80 new students. Then the building the 25+ floors 55<sup>th</sup> St. dorms in phases could begin. They would be filled as they are completed. Construction could start from the south end and then continue northwards, so students wouldn't have to walk in the construction zone. Any moving of students during construction/remodeling could be similar to what happened during the recent renovation of some dorms on East Campus. This may add a little extra time to the original schedule. However, when the whole project is completed, no one will complain about taking some extra time, but congratulate SDSU on having the best project possible.**

I31-17  
Cont.

3. Furthermore, due to its location, redevelopment of this site would not create a distinct west campus housing neighborhood.

**As mentioned above, having 10,500 to 13,125 beds on 55<sup>th</sup> St. would definitely "create a distinct west campus housing neighborhood". This 55<sup>th</sup> St. alternative site would then have the Phase 1 dorms connecting Chapultepec with the 55<sup>th</sup> St. dorms, for a large "distinct west campus neighborhood".**

I31-18

4. would not alleviate the current isolation of Chapultepec Hall,

**This 55<sup>th</sup> St. alternative site would then have the Phase 1 dorms connecting Chapultepec with the 55<sup>th</sup> St. dorms, which would "alleviate the current isolation of Chapultepec Hall".**

I31-19

5. would not be located in an area that has the capacity to accommodate a large number of student housing beds and associated amenities, and would not provide food and convenience services in the vicinity of the proposed project.

**Having 10,500 to 13,125 beds on 55<sup>th</sup> St. is a vastly "large number of student housing beds" in the area. The "associated amenities" and "food and convenience services" for 55<sup>th</sup> St., Phase 1 dorms, and Chapultepec could be provided by creating a mixed-use student area on 55<sup>th</sup> St. It could contain the "associated amenities" and "food and convenience services" such as student-oriented retail stores, indoor recreational areas, restaurants, entertainment venues, etc. built on the first floors of the 55<sup>th</sup> St. dorms, similar to South Campus Plaza.**

I31-20

6. Therefore, this alternative is infeasible because it involves use of land that SDSU presently does not own or control and would require time and cost to transfer to SDSU ownership,

**Since almost all the 55<sup>th</sup> St. land is owned by Aztec Shops Ltd. (as described above in 1.), which is affiliated with SDSU, it shouldn't take much time to transfer the land over to SDSU. And there would be no need for SDSU to buy the property because Aztec Shops Ltd owns it and a costless transfer to SDSU is all that is needed. Since Aztec Shops Ltd.'s function is to support SDSU, its ownership of almost all of 55<sup>th</sup> St. is for the benefit of SDSU in the future. And this future is now. This is a once-in-a-lifetime opportunity for SDSU to develop 55<sup>th</sup> St. to its full potential by creating a West Campus village with many dorm residences and shops for its students. If not now, when?**

I31-21

**Any private property on 55<sup>th</sup> St. could either be purchased by SDSU or be negotiated as a public-private joint arrangement to tie in with the rest of this area, somewhat similar to the arrangement the private builder made with SDSU for the apartments on 5030 College Ave. All this land acquisition could be accomplished before Phase 1 is completed.**

7. as well as result in an inefficient expenditure of funds to result in the desired increase in campus housing inventory,



## Responses to Comments – Individuals

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My comments above state how 10,500 to 13,125 beds could be built on 55<sup>th</sup> St. This compares to the scant 1716 beds in the proposed Phases 2 and 3. For comparison purposes, suppose the rent is \$1,000 a month per bed for 10 months out of a year. In annual income dollars, Phases 2 and 3 would generate only 17 million dollars a year vs 55<sup>th</sup> St.'s 105 million to 131 million dollars. Therefore, the "inefficient expenditure of funds" would be building Phases 2 and 3 instead of building 55<sup>th</sup> St.

Even building dorms containing only 13 floors, about half the 25+ floors in the above examples for the 55<sup>th</sup> St. dorm buildings, that would be a total of from 5,250 to 6,563 beds for a total annual income of 53 million to 66 million dollars. That is still much more than the annual 17 million dollars from Phases 2 and 3. Plus it saves a canyon!

8. and fail to meet most of the basic project objectives.

**As described in points 1-7 above, the replacement of Phases 2 and 3 with 55<sup>th</sup> St. will meet all the "basic project objectives" listed in Section 2.4 of the DEIR.**

SDSU is neglecting its fiduciary, environmental, and educational responsibilities by not pursuing the more lucrative 55<sup>th</sup> St. option. This 55<sup>th</sup> St. option would protect the canyon and allow more students to reside on campus, thus improving their grades and SDSU's graduation reputation.

Thank you for your time and consideration in working with the community to select the best area for new dorms that will benefit both SDSU and the community.

Andre Beauparlant  
College Area resident  
andybowus@yahoo.com

I31-22  
Cont.

I31-23

I31-24

I31-25

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## **Response to Comment Letter I31**

**Andre Beauparlant**

**May 31, 2017**

- I31-1** The comment is an introduction to comments that follow. No further response is required.
- I31-2** The comment expresses the opinions of the commentator and provides factual background information. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I31-3** The comment expresses the opinions of the commentator and provides factual background information. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I31-4** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I31-5** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I31-6** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the

## Responses to Comments – Individuals

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environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-7** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-8** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-9** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-10** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close

of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-11** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-12** The comment relates to the 55th Street alternative and suggests providing access via a pedestrian bridge. The 55th Street alternative is analyzed in Draft EIR Section 6, Alternatives, and the Alternatives Thematic Response included in this Final EIR. The comment represents the opinion of the commentator and does not raise any specific issue regarding the adequacy of the Draft EIR analysis. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I31-13** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-14** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close

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of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-15** The comment is an introduction to comments that follow. No further response is required.

**I31-16** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-17** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-18** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any

## Responses to Comments – Individuals

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additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-19** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-20** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-21** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-22** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for

## Responses to Comments – Individuals

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additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-23** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-24** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I31-25** The comment is a conclusion to previous comments. No further response is required.



## Responses to Comments – Individuals

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### Comment Letter I32

From: **Ann Cottrell** <[adcottrell@me.com](mailto:adcottrell@me.com)>  
Date: Fri, May 26, 2017 at 10:50 PM  
Subject: DEIR process question  
To: Shinn Laura <[lshinn@mail.sdsu.edu](mailto:lshinn@mail.sdsu.edu)>

Dear Ms. Shinn,

A number of people have been asking what happens after June 5, the deadline for DEIR responses.

We know that SDSU must respond to them and to be honest, most assume that there will be responses explaining why there will be no change.

However some hope that some of the issues might lead to revisions and in particular wonder about the memo from President Hirshman saying that he has directed that the project be modified to address significant impacts of phase III and parts of phase II. We would imagine this would require a new DEIR. Is that the case? If so will that be made public and available for review.?

Finally, how will we be notified of the date of Trustees meeting in September and how far in advance of the meeting is it likely to be announced.

Thank you

Ann Cottrell

I32-1

I32-2

I32-3

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## Response to Comment Letter I32

Ann Cottrell

May 26, 2017

- I32-1** Following the close of the comment period, a Final EIR will be prepared that will include the Draft EIR, any revisions to the Draft EIR, and responses to comments. The remainder of the comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I32-2** The comment is acknowledged. However, the Draft EIR does not contain significant new information warranting a new EIR or recirculation of the Draft EIR.

A new EIR or a recirculation of the Draft EIR is necessary only if significant new information is added after public review, but before final certification of the EIR. (Pub. Resources Code, § 21092.1; 14 Cal. Code Regs. § 15088.5, subd. (a).) The new information is significant when it: (i) shows a new, substantial environmental impact resulting either from the proposed project or from a mitigation measures; (ii) shows a substantial increase in the severity of an environmental impact, except that recirculation would not be required if mitigation that reduces the impact to insignificance is adopted; or (iii) shows a feasible alternative or mitigation measure, considerably different from those considered in the EIR, that clearly would lessen the significant environmental impacts of a proposed project and the proposed project proponent declines to adopt it. (See *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1130.) Recirculation is not required when the changes merely clarify, amplify, or make insignificant modification to an adequate EIR.

Here, the new information, elimination of Phases II and III, does not show new, substantial environmental impacts and, to the contrary, results in *reduced* impacts and the complete elimination of significant unavoidable impacts. Furthermore, where applicable, the Draft EIR separately analyzed the potential environmental impacts resulting from each Phase of the Project. As such, the Draft EIR identifies the impacts that would result with implementation of a Phase I Project, with corresponding mitigation identified as necessary. Lastly, the new information shows neither a feasible alternative nor mitigation measure, considerably different from those in the Draft EIR, that clearly would lessen the significant environmental impacts. In sum, the elimination of Phases II and III is not considered significant new information within the meaning of CEQA and, as such, recirculation is not required.

## Responses to Comments – Individuals

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- I32-3** The comment is acknowledged and appreciated. Information regarding the Board of Trustees meeting on September 19 and 20, 2017 will be placed on the California State University website, which can be accessed using the following link: <https://www2.calstate.edu/csu-system/board-of-trustees/Pages/default.aspx>.

## Responses to Comments – Individuals

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### Comment Letter I33

From: **Dan Cornthwaite** <[dan.cornthwaite@me.com](mailto:dan.cornthwaite@me.com)>  
Date: Mon, May 29, 2017 at 11:18 PM  
Subject: SDSU Project  
To: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

Laura, I live in College View Estates and am in support of the university's plans to expand the on campus residency by expanding student housing on the south side of campus. SDSU has proven themselves to be a responsible partner with the community on a variety of levels. This project will address many needs for the campus as well as for the community.

Sent from my iPhone

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I33-1

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**Response to Comment Letter I33**

**Dan Cornthwaite**

**May 29, 2017**

- I33-1**      The comment is acknowledged and appreciated. The comment expresses general support for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.

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### Comment Letter I34

Beverly Butler  
5351 Saxon St.  
San Diego, CA 92115  
butlerbe503@gmail.com

May 31, 2017

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

As a 33-year resident of College View Estates, a wonderful single-family residential neighborhood adjacent to Aztec Canyon (just west of SDSU), I am opposed to SDSUs pending dorm construction project, particularly Phases II and III. Even SDSUs own President Elliot Hirshman has recognized the significant impacts of this project and deemed it unacceptable due to non-mitigatable, irreversible significant impacts. As President Hirshman said in a statement on May 8, 2017: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

I34-1

I applaud Dr. Hirshman's statement and offer the following insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I34-1

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU did not even begin public engagement about this project until December of 2016 although it developed the plan beginning in 2010 and updated it in 2013. In order to meet their goal of breaking ground in the fall of 2017 SDSU has eliminated environmentally preferable sites and failed to use mechanisms that minimize environmental impacts. SDSU has placed these potentially environmentally-damaging constraints on this project: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); (2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSUs DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input.

I34-3

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSUs Sophomore Success Program. SDSUs west

I34-4

## Responses to Comments – Individuals

campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. It appears that SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies, including SDSU, are required to be as objective and rigorous on their own EIRs as private entities are when they seek to develop.

I34-4  
Cont.

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that would result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that could be mitigated through environmentally-responsible planning.

I34-5

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included demolishing the two lowest ranked campus dorms, Maya/Olmeca, and replacing them with two towers totaling 1,600 students. This existing approved action would be environmentally superior to greenfield development in Aztec Canyon and would use disturbed, brownfield land. SDSU has chosen to bias its Goals and Objectives to west campus rather than pursue an already approved option for redevelopment in its current DEIR.

I34-6

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The superior efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. Lot U must be considered for maximum density construction only.

I34-7

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or

I34-8

## Responses to Comments – Individuals

candidates for listing; or otherwise are considered sensitive.” SDSUs brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

134-8  
Cont.

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

134-9

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSUs construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

134-10

9. SDSUs analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSUs Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday when SDSU was not in session. SDSU fails to measure the existing sound from student residences and use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west.

134-11

10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU declares that its project is more important than the community’s cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in greenhouse gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breathe the emissions from increased, slower moving traffic and the impacts on state of California greenhouse gas targets. SDSUs

134-12

## Responses to Comments – Individuals

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traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

↑ I34-12  
↑ Cont.

Sincerely,

Beverly Butler

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu), [TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu),  
[Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

**INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE TO ALL CSU TRUSTEES  
AND ALTERNATES**

**Response to Comment Letter I34**

**Beverly Butler**

**May 31, 2017**

- I34-1** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I34-2** The comment is an introduction to comments that follow. No further response is required.
- I34-3** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I34-4** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I34-5** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I34-6** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007

## Responses to Comments – Individuals

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Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.

**I34-7** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.

**I34-8** Please see the Biological Resources Thematic Response for information responsive to this comment.

**I34-9** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. Since release of the Draft EIR the Project has been modified to remove Phases II and III, ensuring no impacts to biological resources would occur in the canyon. The comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I34-10** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation do not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment apply do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The project is in compliance with all applicable regulations at the time of this writing. The comment claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan

which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

- I34-11** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,” and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the traffic noise analysis has no connection with the ambient noise levels measured.

Although the noise measurements conducted on January 16 fairly represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. As shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on

## Responses to Comments – Individuals

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April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, any such effects are no longer a concern because the proposed project has been modified and SDSU no longer plans to pursue the development of Phases II and III, so no further response to this comment is necessary.

**I34-12** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. Because the proposed project has been modified and no longer includes Phase III, there will be no significant and unavoidable traffic impacts. Please see Final EIR, Preface, for additional information regarding the project modifications. As to the comments regarding greenhouse gases and criteria pollution, EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.



### Comment Letter I35

From: **Michael Hodgson** <[hodgsonmichael100@gmail.com](mailto:hodgsonmichael100@gmail.com)>  
Date: Wed, May 31, 2017 at 1:05 PM  
Subject: Remington Road Dorm Proposals  
To: [lshinn@mail.sdsu.edu](mailto:lshinn@mail.sdsu.edu)

We are writing to express our deep concerns over the proposed dorms on Remington Road. The proposed buildings will permanently and significantly change the land use and quite frankly change the physical presence the university has on the land. The current university building layouts have blended in with the nature beauty of the land, this new proposal will drop significant mass at the end of the university boundaries, create an eye sore to the entrance of our neighborhood and significantly negatively impact our property values.

As an alumnus of the University of Illinois I understand the need for growth and improving student experience to attract the targeted student base but I feel you are making this decision with little regard to our neighborhood density, property values and environmental impact.

I am sure you are aware of how strong the neighborhood residences are against this proposal and will fight this matter with legal challenges and strong public comment. I urge you to work with the neighborhood associations and city leaders to bring this matter to a conclusion that all parties can accept.

Regards,

Mike Hodgson  
Steve Brown  
5104 Remington RD  
San Diego, CA 92115

Mike Hodgson  
[hodgsonmichael100@gmail.com](mailto:hodgsonmichael100@gmail.com)  
[760-501-5004](tel:760-501-5004)

I35-1

I35-2

I35-3

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**Response to Comment Letter I35**

**Mike Hodgson**

**May 31, 2017**

- I35-1** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I35-2** This comment expresses the opinions of the commentator in regards to the proposed mass and scale of the Project. The aesthetic impact of the Project including impacts to the existing visual quality and character of the site and its surroundings are addressed in Section 4.1, Aesthetics, of the Draft EIR. The commenter also states that the Project will have an adverse effect on property values. Property values are not considered in an analysis of environmental impacts under CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise any issue concerning the adequacy of the Draft EIR.
- I35-3** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

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Rosemary Hagan  
5387 Saxon St.  
San Diego, CA 92115  
Rhagan15@cox.net

May 30, 2017

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

I have lived in the College View Estates neighborhood of San Diego for 61 years. I have attended the public meetings in which SDSU representatives have presented and attempted to explain and justify the new dormitory building project proposed for the beautiful canyon west of the existing Chapultepec dorm and adjacent to our single-family residential neighborhood. I strongly oppose this project based on the following deficiencies in the DEIR:

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSUs own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSUs DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11<sup>th</sup> hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.
2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSUs Sophomore Success Program. SDSUs west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSUs Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased

I36-1

I36-2

I36-3

## Responses to Comments – Individuals

the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I36-3  
Cont.

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.
4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.
5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.
6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing; or otherwise are considered sensitive." SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I36-4

I36-5

I36-6

I36-7

## Responses to Comments – Individuals

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.
8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSUs construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption.
9. SDSUs analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSUs Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the "fan shape" of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.
10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in greenhouse gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breathe the emissions from increased, slower moving traffic and the impacts on state of California greenhouse gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

136-8

136-9

136-10

136-11

## Responses to Comments – Individuals

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Sincerely,

Rosemary Hagan

CC: [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu), [TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu),  
[PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

NOTE: [TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu) instructions are DISTRIBUTE TO ALL CSU TRUSTEES AND ALTERNATES



**Response to Comment Letter I36**

**Rosemary Hagan**

**May 30, 2017**

- I36-1**      The comment is an introduction to comments that follow. No further response is required.
- I36-2**      The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I36-3**      The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I36-4**      The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I36-5**      The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.

## Responses to Comments – Individuals

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**I36-6** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.

**I36-7** Please see the Biological Resources Thematic Response for information responsive to this comment.

**I36-8** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. Since release of the Draft EIR the Project has been modified to remove Phases II and III, ensuring no impacts to biological resources would occur in the canyon. The comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I36-9** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation do not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment apply do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The project is in compliance with all applicable regulations at the time of this writing.

The comment claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I36-10** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,” and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the traffic noise analysis has no connection with the ambient noise levels measured.

Although the noise measurements conducted on January 16 fairly represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. As shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise

## Responses to Comments – Individuals

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measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, any such effects are no longer a concern because the proposed project has been modified and SDSU no longer plans to pursue the development of Phases II and III, so no further response to this comment is necessary.

- I36-11** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. Because the proposed project has been modified and no longer includes Phase III, there will be no significant and unavoidable traffic impacts. Please see Final EIR, Preface, for additional information regarding the project modifications. As to the comments regarding greenhouse gases and criteria pollution, EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

### Comment Letter I37

From: **Graydon Calder** <[gkcalder@me.com](mailto:gkcalder@me.com)>  
Date: Tue, May 30, 2017 at 12:25 PM  
Subject: Formal Comments for SDSU DEIR (4/21/17)  
To: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

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

Dear Ms Shinn,

As a resident of Del Cerro for 52 years and a former student at SDSU, I am very concerned about the proposal to build six dorm towers in the canyon area adjacent to SDSU.

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter "Aztec Canyon") directly west of Chapultepec Hall. SDSU withheld this project from the public until December 2016, and failed to disclose this "reasonably foreseeable" project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I37-1

I37-2

I37-3

I37-4

I37-5

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSUs Sophomore Success Program. SDSUs west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSUs Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I37-6

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSUs website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I37-7

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I37-8

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSUs own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I37-9

6. SDSUs biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing; or otherwise are considered sensitive." SDSUs brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I37-10

## Responses to Comments – Individuals

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7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

137-11

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSUs construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption.

137-12

9. SDSUs analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSUs Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the "fan shape" of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

137-13

10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

137-14

Sincerely,

Graydon K. Calder  
6417 Norman Lane  
San Diego, CA 92120

## Responses to Comments – Individuals

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CC: [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu), [TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [fi@mail.sdsu.edu](mailto:PresOf<br/>fi@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

NOTE: [TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu) instructions are DISTRIBUTE TO ALL CSU TRUSTEES  
AND ALTERNATES



**Response to Comment Letter I37**

**Graydon K. Calder**

**May 30, 2017**

**I37-1** The comment is an introduction to comments that follow. No further response is required.

**I37-2** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the Project was in the conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I37-3** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I37-4** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I37-5** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I37-6** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I37-7** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I37-8** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I37-9** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I37-10** Please see the Biological Resources Thematic Response for information responsive to this comment.

**I37-11** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. Since release of the Draft EIR the Project has been modified to remove Phases II and III, ensuring no impacts to biological resources would occur in the canyon. The comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I37-12** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation do not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment apply do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I37-13** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

## Responses to Comments – Individuals

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and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the traffic noise analysis has no connection with the ambient noise levels measured.

Although the noise measurements conducted on January 16 fairly represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. As shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, any such effects are no longer a concern because the Project has been modified and SDSU no longer plans to pursue the development of Phases II and III, so no further response to this comment is necessary.

- I37-14** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. Because the Project has been modified and no longer includes Phase III, there will be no significant and unavoidable traffic impacts. Please see Final EIR, Preface, for additional information regarding the project modifications. As to the comments regarding greenhouse gases and criteria pollution, EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

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## Responses to Comments – Individuals

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### Comment Letter I38

From: **Sara Ellis** <[sm\\_napier@yahoo.com](mailto:sm_napier@yahoo.com)>  
Date: Mon, May 29, 2017 at 7:00 AM  
Subject: Please respond  
To: [lshinn@mail.sdsu.edu](mailto:lshinn@mail.sdsu.edu)

Why cannot you tear down one of the old dorms on 55th or on campus and build a high rise dorm?

The students will be closer to the center of campus and you will be replacing old dorms and be able to house many more students then the 2 or 3 story dorms from the 60's? Being closer to the center of campus will allow the students to be closer to the cafeteria.

How can you allow the machines to invade the habitat of others now a days when our schools are teaching save the habitats. Sit in on a 3rd grade classroom curriculum and listen. Don't pollute the oceans and don't destroy the canyons.

There is no excuse to kill!!!! Putting, relocating, animals to another area for wildlife living is not a solution. Many were killed with intruding on their homes.

I am the Lorax and I speak for the Trees and animals...

Listen before it tis too late, choose another area and it will be a Win Win solution!!!

Thank you,  
Sally Ellis, former teacher and believer in brainstorming to find the best solution...Not always the easiest!!!  
Please don't take the habitat.

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### Response to Comment Letter I38

**Sally Ellis**  
**May 29, 2017**

- I38-1** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I38-2** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I38-3** With respect to the comment regarding the canyon, see Biological Resources Thematic Response, which states that Phases II and III will not be developed. Phase III included the most severe impacts to the canyon. Phase I is still proposed as part of the Project and does not impact the canyon. With these modifications, the Project will not result in significant unavoidable impacts, and all environmental impacts will be mitigated to less than significant.
- I38-4** See response to comment I24-3.
- I38-5** See response to comment I24-3.
- I38-6** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to

## Responses to Comments – Individuals

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public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I38-7**      The comment is a conclusion to previous comments. No further response is required.

### Comment Letter I39

From: **Sam Chieh** <[schieh@gmail.com](mailto:schieh@gmail.com)>  
Date: Thu, Jun 1, 2017 at 3:26 PM  
Subject: CEQA Comments on SDSU 4/21/17 DEIR  
To: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)  
Cc: Kristine Chieh <[kristine.chieh@gmail.com](mailto:kristine.chieh@gmail.com)>

Hello Ms. Shinn,

The following are formal comments on the materially deficient draft EIR and unacceptable proposed project of SDSU submitted for review on April 21, 2017.

**SDSUs alleged “unavoidable”, non-mitigatable, significant impacts are for the proposed project can be mitigated through the proper, environmentally sensitive planning methods that are implied by CEQA.**

SDSU failed in its obligation to CEQA and the community when it declared the impacts of its project were unavoidable, non-mitigatable significant impacts. SDSU simply surrendered to its reckless, self-imposed timeline that was created by planning failure. SDSUs proposed project and DEIR suffers from: 1) lack of planning, 2) lack of transparency, 3) gaming of objectives, 4) failure to adequately consider risks, 5) failure to consider prior approved projects, 6) failure to utilize brownfield and disturbed land to its fullest, and 7) an apparent disregard for the environment. The DEIR is insufficient and the proposed project must be rejected and SDSU sent back to the drawing board.

**SDSU created its own significant impacts through a lack of planning, and under CEQA, the environment cannot be allowed to suffer for SDSUs failure. SDSU can use proper planning techniques with adequate time to mitigate the project impacts. The proposed project must be rejected.** Websites and the DEIR show designs of SDSUs project going back to 2010 that appear to be virtually unchanged except for reductions in density on disturbed land that – reductions that damage the environment. In 2013, SDSU had plans drawn up by Carrier Johnson that are referenced in the DEIR. Had SDSU not created an artificial deadline of its “Sophomore Success” and false urgency by keeping the project secret, it could have used its time to acquire land, tear down old buildings, and consider the use of sites that SDSU and CSU Trustees approved in the 2007 Campus Master Plan and EIR. SDSUs impacts can be fully mitigated by taking the time needed for SDSU to consider sites that require procurement, condemnation, or demolition/rebuilding instead of rejecting them as taking too long. CEQA requires that SDSU mitigate its artificial deadline and choose disturbed, brownfield sites over Aztec Canyon (the canyon directly west of Chapultepec Hall) and the proposed project must be rejected.

**SDSU created its own significant impacts through its denial of due process to the taxpaying community and its total lack of disclosure and transparency. This lack of disclosure created significant impacts, and under CEQA, the environment cannot be allowed to suffer for SDSUs failure. The proposed project must be rejected.** As stated above, websites and the DEIR show designs of SDSUs project going back to 2010 that appear to be virtually unchanged except for

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## Responses to Comments – Individuals

reductions in density on disturbed land that – reductions that damage the environment. In 2013, SDSU had plans drawn up by Carrier Johnson that are referenced in the DEIR. Had SDSU come forward in a transparent manner and disclosed this reasonably foreseeable project in its EIRs and other environmental documents post 2010, or surely post 2013, SDSU would have benefitted from public input and more time to mitigate any significant impacts. SDSU has failed to mitigate by the very process used for its project, and the project must be rejected.

**SDSU lack of disclosure and transparency has damaged the surrounding community and created Piecemealing under CEQA. The proposed project must be rejected.** Because SDSU had a reasonably foreseeable West Campus project since 2010, or surely since 2013 when it's clear that SDSU paid Carrier Johnson for detailed plans, SDSU had an affirmative obligation to disclose the plan as a cumulative impact under CEQA. SDSU did not, and the proposed project is now piecemealing, because it was not considered concurrently with Plaza Linda Verde and other campus decisions. Further, surrounding residents made (or were unable to make) informed housing purchase and sale decisions because SDSU withheld information about its reasonably foreseeable project. SDSUs piecemealing requires that the project be rejected.

**SDSU gamed the objectives of the project to force it to west campus, and as a result, the proposed project unnecessarily damages the environment. The proposed project must be rejected.** SDSU's project objectives are so unnecessarily narrowly focused that they force the project to the undeveloped Aztec Canyon. For example, SDSU requires SDSU-owned land. SDSU requires sites to create a "west" community like the "east" community. SDSU requires reduction in the isolation of Chapultepec Hall – a hall that SDSU developed subject to CEQA and an EIR that should not have had any material defects 30 years ago – although now it is so-called "isolated". SDSUs proposed project must be rejected.

**SDSUs proposed project is to be built in the CalFire designated Very High Fire Hazard Aztec Canyon area. SDSU fails to adequately recognize and mitigate the risks in its plan. The proposed project must be rejected.** SDSU proposes teenaged students with FIREPITS adjacent to Aztec Canyon. This is directly analogous to allowing firepits in the middle of a refinery or other Very High Fire Hazard area. While it is likely IMPOSSIBLE to safely build in Aztec Canyon when the residents will be 1,600 freshman students, a list of MANDATORY mitigations include: non-operable windows, no flammable sources whatsoever (e.g., no FIREPITS), no access to Aztec Canyon from the project, no balconies, no rooftop access, and no ability for students to throw anything off of any patio into Aztec Canyon. The proposed project contains nearly all hazards listed and must be rejected for the safety of the community.

**SDSU proposed, and the Board of Trustees certified, the demolition and rebuild of Maya/Olmeca Halls as part of its 2007 Campus Plan. Maya/Olmeca were the lowest student rated halls on campus in an SDSU study. SDSU failed to even consider this EIR certified, approved project in its alternatives analysis, creating excessive bias toward the proposed project. The proposed project must be rejected.** SDSU refused to consider its own approved projects on East campus, yet another display of extreme gaming and bias toward forcing approval of the proposed project, along with its non-mitigatable significant impacts. It is

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## Responses to Comments – Individuals

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environmentally irresponsible for the proposed project to include a greenfield site when a brownfield redevelopment project has already been approved in a prior plan and EIR and the current proposed project must be denied.

139-21

SDSU fails to fully utilize Lot U in its proposed project, instead opting for approximately 55% of its demonstrated density, causing non-mitigatable significant impacts. The proposed project must be rejected. In work contracted by SDSU in 2013, Carrier Johnson provided density planning for approximately 1,400 beds on Lot U, east of Chapultepec Hall. SDSUs proposed plan reduces the use of Lot U to 850 students, thereby forcing another 550 students into Aztec Canyon. Aztec Canyon is not an environmentally appropriate choice, especially in light of SDSUs inadequate use of the disturbed Lot U and SDSU proposed project must be rejected.

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SDSUs proposed project develops an environmentally sensitive, very high fire hazard canyon because SDSU targeted it with an environmentally unfriendly site requirement for an "existing undeveloped area." The proposed project must be rejected. It is almost unimaginable the SDSU targeted undeveloped land over brownfield, disturbed, or redevelopment sites. It appears that this was part of SDSUs concerted effort to ignore mitigations, force the proposed project into Aztec Canyon, and declare that the results were non-mitigatable and unavoidable. SDSU cannot be allowed to arbitrarily set tight deadlines, target specific areas, and ignore the environment. SDSUs EIR is insufficient and the proposed project must be rejected.

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Sincerely,

Sam and Kristine Chieh

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**Response to Comment Letter I39**

**Sam and Kristine Chieh**

**June 1, 2017**

- I39-1**      The comment is an introduction to comments that follow. No further response is required.
- I39-2**      The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I39-3**      The comment that SDSU “failed in its obligation to CEQA” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I39-4**      The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I39-5**      The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected.
- I39-6**      The comment is acknowledged and appreciated. The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. With respect to the comment regarding siting choices, the comment raises an issue that was studied and evaluated in Chapter 6.0, Alternatives, of the Draft EIR. Alternatives to the Project location received extensive analysis in the Draft EIR. The Draft EIR assessed numerous alternative Project locations and eliminated them because they were infeasible, failed to meet the Project objectives, or failed to avoid or reduce

## Responses to Comments – Individuals

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- significant impacts. Please see Alternatives Thematic Response for information responsive to the comment. Also, with respect to the comment regarding the 2007 Campus Master Plan and EIR, the California State University Board of Trustees' prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative.
- I39-7** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I39-8** The comment states SDSU must "choose disturbed, brownfield sites" over the proposed Project site. The comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I39-9** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I39-10** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall "since at least 2010." The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until



## Responses to Comments – Individuals

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March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected.

**I39-11** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I39-12** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I39-13** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the Project was in the conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I39-14** Please refer to response to comment I39-13.

## Responses to Comments – Individuals

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- I39-15** Please refer to response to comment I39-13.
- I39-16** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I39-17** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I39-18** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I39-19** As identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. There will be no direct pathway for students into the Canyon that does not currently exist. It is arguable that the presence of the new student housing would deter students from entering the Canyon as there will be more potential observers to report such activity. Therefore, the Project complies with the requirements for building in VHFHSZs and does not encourage or facilitate access into the adjacent canyon, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings.
- I39-20** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I39-21** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca

## Responses to Comments – Individuals

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Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.

**I39-22** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.

**I39-23** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.

**I39-24** As identified in the Project's Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. There will be no direct pathway for students into the Canyon that does not currently exist. It is arguable that the presence of the new student housing would deter students from entering the Canyon as there will be more potential observers to report such activity. Therefore, the Project complies with the requirements for building in VHFHSZs and does not encourage or facilitate access into the adjacent canyon, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project's new buildings.

**I39-25** The comment is incorrect in asserting that "any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment." The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR the Project has been modified to remove Phases II and III, ensuring no impacts to biological resources would occur in the canyon. The comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I39-26** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the

## Responses to Comments – Individuals

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Project. No further response is required because the comment does not raise an environmental issue.

- I39-27** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

## Responses to Comments – Individuals

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### Comment Letter I140

On Mon, Jun 5, 2017 at 7:02 PM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

Name	Michael J Tabler
Address	5428 Redding Road, San Diego, CA 92115
Phone number	<a href="tel:619-582-5412">619-582-5412</a>

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I140-1

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts

I140-2

that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

↑ 1140-2  
Cont.

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

1140-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

1140-4

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

1140-5

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I140-6

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I140-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I140-8

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or

I140-9

## Responses to Comments – Individuals

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candidates for listing; or otherwise are considered sensitive.” SDSUs brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

↑  
I140-9  
Cont.

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I140-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSUs construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

I140-11

9. SDSUs analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSUs Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I140-12



## Responses to Comments – Individuals

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10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

1140-13

11. SDSUs President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

1140-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

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### Response to Comment Letter I40

**Karen Jorgensen**

**June 2, 2017**

**I40-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the Project was in the conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I40-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I40-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I40-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I40-5** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Further, the comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I40-6** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I40-7** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I40-8** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca

## Responses to Comments – Individuals

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Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.

**I40-9** The comment relates to project alternatives. However, it should be noted that following distribution of the Draft EIR and the close of the comment period, the proposed project was modified to eliminate Phase II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. With response to information regarding the alternative of developing 1,400 beds on Lot U (Phase I), responsive information is provided in the Alternatives Thematic Response

**I40-10** Please see the Biological Resources Thematic Response for information responsive to this comment.

**I40-11** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR the Project has been modified to remove Phases II and III, ensuring no impacts to biological resources would occur in the canyon. The comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I40-12** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation do not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment apply do not directly apply to the project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory.

Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

- I40-13** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment states that the noise analysis failed to measure the existing sound from student residences. The comment also states that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design”. Additionally, the comment states that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Section 4.11, ambient noise measurements were conducted on Monday, January 16, 2017 which was on Martin Luther King Day. Classes were not in session on this day. Community noise measurements for environmental studies are typically conducted for two purposes: to generally characterize the ambient noise environment on and around the project site, and to calibrate or verify the accuracy of a traffic noise model, when traffic noise dominates the ambient noise environment. In this instance, although traffic noise was the primary noise source, there was substantial influence from other noise sources (such as noise from students on the adjacent athletic fields, mechanical noise from HVAC systems, noise from landscape equipment); thus, the measurements were not used to calibrate the FHWA Traffic Noise Model. The measured ambient noise data thus has no bearing on the noise impacts analysis or results. The traffic impacts analysis used the traffic data provided by the traffic analysis for the Project, and has no connection with the ambient noise levels measured. Although it is believed that the noise measurements conducted on January 16 fairly represent typical noise conditions, in an abundance of caution noise measurements were carried out again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1. On this day, classes were in session. As shown below, the measurement results were generally similar. At receivers R1, R2, R4 and R5, the measured ambient noise levels were 1 to 2 decibels lower on April 27. At receiver R3, the measured ambient noise level was approximately 5 decibels lower than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. To summarize, the results of the ambient noise

## Responses to Comments – Individuals

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measurements stand on their own and do not have an effect on the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Section 4.11.3.1 (Existing Environmental Setting), noise measurement location R3 was on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department. With regards to potential noise effects from Phase III, any such effects are not an issue because SDSU no longer plans to pursue the development of Phases II and III, so no further response to this comment is necessary.

**I40-14** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I40-15** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. Because the proposed project has been modified and no longer includes Phase III, there will be no significant and unavoidable traffic impacts. Please see Final EIR, Preface, for additional information regarding the project modifications. As to the comments regarding greenhouse gases and criteria pollution, EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I40-16** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther

## Responses to Comments – Individuals

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King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,” and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the traffic noise analysis has no connection with the ambient noise levels measured.

Although the noise measurements conducted on January 16 fairly represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. As shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the



## Responses to Comments – Individuals

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ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, any such effects are no longer a concern because the proposed project has been modified and SDSU no longer plans to pursue the development of Phases II and III, so no further response to this comment is necessary.

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## Responses to Comments – Individuals

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### Comment Letter I141

From: Greg & Hilda <[grilda@cox.net](mailto:grilda@cox.net)>  
Date: Mon, Jun 5, 2017 at 7:25 PM  
Subject: Aztec Canyon  
To: [lshinn@mail.sdsu.edu](mailto:lshinn@mail.sdsu.edu)

Good Evening, I am writing you concerning the proposed building of the dorms in Aztec Canyon. I have three main concerns. First, since it appears that this project has been under works since 2010, or at the very least, 2013, why did a "multi-purpose" athletic field be built on 55th next to the existing parking structure that could have been used for the dorm project with out disturbing the residents or the canyon?

Second, what were the "weighted criteria" and who designed these that they so conveniently "dismissed" alternative sites? It appears from the open meeting that there are a number of alternative sites either owned by SDSU or Aztec Shops that could be used for this project and would decrease impact on the community and the environment. Next, could you please publish the "traffic studies" so we can see the numbers and dates of the observations. I find the negligible impact and the number of cars/traffic that we be added to due to this project to be very unrealistic to the point of being "unreliable" and therefore invalid. Lastly, could you please post/publish the emergency response impact report or anything like that that you have? If there is a fire in any of the canyons, there rare only TWO ways out. Any emergency will lead to gridlock with people attempting to evacuate and the with panic setting in, will most likely lead to human tragedy and loss of life.

Please think with your hearts and minds, and not with your bank accounts.

Greg Babick

Sent from my iPad

I141-1

I141-2

I141-3

I141-4

I141-5

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**Response to Comment Letter I41**

**Ken Burkhart**

**June 2, 2017**

- I41-1** The comment is acknowledged and appreciated. The comment expresses general support for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I41-2** The comment is acknowledged and appreciated. The Project has been modified to eliminate Phases II and III such that the Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.
- I41-3** The comment is acknowledged and appreciated. The Project has been modified to eliminate Phases II and III such that the Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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### Comment Letter I142

Mark Nelson  
5417 Hewlett Dr.  
San Diego, CA 92115

June 5, 2017

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

Via e-mail: lshinn@mail.sdsu.edu

SUBJECT: DEIR Comments

Dear Laura Shinn:

December 15, 2015 SDSU provided an Executive Briefing on the Second Year Live On Requirement. It was obtained via California Public Records Act. That Executive Briefing and its full text document contain a number of statements, some of which are discussed below.

1. SDSU asserts that it will have an "Increase in adjudication cases due to residential staff holding students accountable." Recently, SDSU has lost two court cases, one involving judicial over-reach by SDSU staff in an alleged sexual assault case ruled on by Superior Court Judge Wohlfeil in 2017; and the other a recent \$10K settlement with Francisco Sousa for wrongly accusing him of sexual assault in public emails.  
SDSU's demonstrated abuse of power and judicial failures make the requirement for additional mandatory housing a material risk for students, not a benefit, and as a result SDSU's DEIR must be rejected for failing to examine and fully mitigate the environmental risks posed to captive students.
2. SDSU recognizes that its 2<sup>nd</sup> year live on requirement will create a financial burden/cost constraint for students.  
SDSU's 2<sup>nd</sup> year live on requirement will cause some students to suffer economic hardships by SDSU's own admission. The DEIR must be rejected for failing to examine and balance the social and economic justice of students.
3. SDSU asserts an economic motive for its 2<sup>nd</sup> year live on requirement and construction of housing, in that it will have "financial benefit to university"

1 | Page

I142-1

I142-2

I142-3

I142-4

SDSUs DEIR must be rejected, because SDSU asserts that this is an economic project. SDSUs project cannot be certified with non-mitigatable, significant impacts for profit. The environment is not for sale, even to SDSU.

1142-4  
Cont.

4. SDSU is concerned in its briefing that it will have "bait and switch claims" from its 2<sup>nd</sup> year live on requirement. Apparently SDSU is concerned that students will be forced to live on campus in the ruse of better performance, only to find the dorms to be disruptive, loud and difficult for performance, resulting in more attrition and poorer GPAs. SDSUs DEIR must be rejected as SDSU recognizes a material "bait and switch" risk that student performance may decline. Thus, the primary objective of the proposed project is at material risk.

1142-5

5. SDSU recognizes a number of important partnerships/stakeholders, including CACC (but not CVEA) and local properties (presumably rentals). If so recognized, why did SDSU withhold information about the project from 2010 to 2013 and then from 2013 to Q4 2016? SDSU recognized the value of partnerships/stakeholders yet it denied due process to those partners for over half a decade. SDSUs DEIR must be denied or delayed for lack of due process.

1142-6

6. SDSU asserts that there is higher sexual assault cases (sic) off campus, when objective evidence clearly shows that the existing dorms have more assaults.

According to the SDSU Police and reported in the media, most on-campus sexual assaults (e.g., rapes) occur in the dorms. As a result, increases in the concentration of students living in the dorms can lead to significant impacts on the safety of those students who are mandated to live in the dorms. According to news reports, 11 rapes were reported in student housing at SDSU in 2014. That represents a rate of rape in the dorms of 11 of approximately 4,000 on campus dorm-housed students or a 0.275% rape rate in the SDSU dorms in 2014. In contrast, only 596 rapes were reported in San Diego County in 2014 with approximately 3,300,000 residents which results in a 0.018% rape rate in San Diego County overall. This computes that using SDSU Police and California Attorney General statistics, the rape rate for SDSU dormitories is 1528% higher than the average county rate in San Diego County. The EIR must consider student safety and the increased risk of sexual assault from creating additional dangerous living situations such as additional mandatory dormitory residence requirements versus student self-selection to live off campus. This is a significant hazard that needs to be thoroughly evaluated and mitigated if possible. If the sexual assault/rape rate cannot be mitigated to the level of the general community, the EIR must not be certified.

1142-7

7. SDSU acknowledges that its "capture rate" of sophomores to live in the dorms is currently 3%. Yet, SDSU fails to recognize its inferior position as a supplier of elective housing. SDSUs DEIR must be rejected as it 1) forces students to accept a housing choice they currently overwhelmingly reject and 2) it places the university system's resources at risk as a speculative, risky investment.

1142-8



## Responses to Comments – Individuals

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9. SDSUs analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSUs Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

142-13

10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community’s cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

142-14

11. SDSUs President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman’s statement from May 8, 2017 follows: “In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns.”

142-15

Sincerely,

// Name at top of document is submitters name

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### Response to Comment Letter I42

**Kurt Hoeger**

**June 2, 2017**

**I42-1** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.

**I42-2** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Projects Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I42-3** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment

## Responses to Comments – Individuals

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will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I42-4** The comment is an introduction to comments that follow. No further response is required.

**I42-5** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I42-6** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I42-7** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.

**I42-8** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.

## Responses to Comments – Individuals

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- I42-9** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I42-10** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.
- I42-11** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I42-12** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment apply do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects.

The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

- I42-13** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment states that the noise analysis failed to measure the existing sound from student residences. The comment also states that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design”. Additionally, the comment states that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly

## Responses to Comments – Individuals

attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I42-14** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

## Responses to Comments – Individuals

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- I42-15** The comment regarding President Hirshman’s May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project’s significant environmental impacts will be reduced to less than significant.



## Responses to Comments – Individuals

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### Comment Letter I43

From: **Brian Rickling** <[brian.rickling@gmail.com](mailto:brian.rickling@gmail.com)>  
Date: Fri, Jun 2, 2017 at 2:25 PM  
Subject: Comments for SDSU Draft EIR dated April 21, 2017  
To: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)  
Cc: [TWhite@calstate.edu](mailto:TWhite@calstate.edu), [TrusteeSecretariat@calstate.edu](mailto:TrusteeSecretariat@calstate.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu),  
[PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

June 3, 2017

Laura Shinn

Director, Facilities Planning, Design, and Construction

San Diego State University

5500 Campanile Drive

San Diego, California

92182-1624

I am glad to see that SDSU is working on a plan for increasing student housing on campus. Having lived in the College Area for over 30 years, it is about time that this becomes a priority for the university. However, I find it hard to believe that the canyon behind Chapultepec Hall is your best solution. Development in this area is not even considered in the SDSU Master Plan from 2007. It says a lot about a project when the Master Plan has to be changed in order for this project to be built. SDSU needs to take a hard look at this project and its proposed location again. There are many problematic issues with this planned development.

I43-1

As I have been told, SDSU has had plans for the proposed six dorm towers in the undeveloped, biologically sensitive, high fire hazard canyon (to be referenced as “Aztec Canyon” in this letter) directly west of Chapultepec Hall since at least 2010. SDSU withheld this project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I43-2

## Responses to Comments – Individuals

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This Draft EIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I 43-3

The following comments highlight some of the insufficiencies of the DEIR that must be considered to be compliant with the letter and spirit of CEQA:

I 43-4

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Clmecca Halls for 1600 beds) and 3) required use of undeveloped land. As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and public input. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. SDSU should have built in time for environmentally responsible site selection.

I 43-5

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I 43-6

3. Environmental Justice dictates that the DEIR's Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective

I 43-7

## Responses to Comments – Individuals

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redevelopment of the 30-year-old Chapultepec Hall local area. SDSUs website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires “a distinct west campus housing neighborhood similar to ... the east side of campus” (eliminates/diminishes east campus solutions) and Objective 2 requires “alleviate isolation of Chapultepec” and Objective 6 requires exploitation of “an existing undeveloped area”. When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I43-7  
Cont.

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I43-8

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. Lot U must be considered for maximum density construction only.

I43-9

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, “San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing; or otherwise are considered sensitive.” SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I43-10

## Responses to Comments – Individuals

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7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU cannot assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, destruction of any portion of Aztec Canyon.

I43-11

8. SDSU's analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU's Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the "fan shape" of the proposed Phase III construction. SDSU's models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU's maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I43-12

9. SDSU's significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I43-13

While I agree with the planning for additional student housing to be built on campus, I cannot agree with the concept proposed with this development. The impacts have not been adequately reviewed, the community is not being considered as part of the equation, and I expect much more from SDSU than to try and run this through the system while once again ignoring the residents that surround the campus. Building high-rise dorms in an undisturbed canyon only hundreds of feet from single family residential neighborhoods cannot be considered anything other than irresponsible planning. There are better options. Better options that were noted in your own

I43-14

## Responses to Comments – Individuals

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previous master plan. Better options that have already been approved for new housing at SDSU campus.

↑ I43-14  
Cont.

I hope that you make the extra effort to look at this project from the community aspect as well as from SDSU goals. There are alternatives that can serve the wants and needs of both SDSU and the community.

↑ I43-15

Sincerely,

Brian S. Rickling

4696 55<sup>th</sup> Street

San Diego, Ca 92115

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## **Response to Comment Letter I43**

**Brian S. Rickling**

**June 23, 2017**

**I43-1** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I43-2** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the Project was in the conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I43-3** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment

## Responses to Comments – Individuals

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will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I43-4** The comment is an introduction to comments that follow. No further response is required.

**I43-5** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I43-6** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I43-7** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.

**I43-8** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.

**I43-9** The comment relates to project alternatives. . However, it should be noted that following distribution of the Draft EIR and the close of the comment period, the



## Responses to Comments – Individuals

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- proposed project was modified to eliminate Phase II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. With response to information regarding the alternative of developing 1,400 beds on Lot U (Phase I), responsive information is provided in the Alternatives Thematic Response.
- I43-10** Please see the Biological Resources Thematic Response for information responsive to this comment.
- I43-11** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR the Project has been modified to remove Phases II and III, ensuring no impacts to biological resources would occur in the canyon. The comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I43-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment states that the noise analysis failed to measure the existing sound from student residences. The comment also states that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design”. Additionally, the comment states that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Section 4.11, ambient noise measurements were conducted on Monday, January 16, 2017 which was on Martin Luther King Day. Classes were not in session on this day. Community noise measurements for environmental studies are typically conducted for two purposes: to generally characterize the ambient noise environment on and around the project site, and to calibrate or verify the accuracy of a traffic noise model, when traffic noise dominates the ambient noise environment. In this instance, although traffic noise was the primary noise source, there was substantial influence from other noise sources (such as noise from students on the adjacent athletic fields, mechanical noise from HVAC systems, noise from landscape equipment); thus, the measurements were not used to calibrate the FHWA Traffic Noise Model. The measured ambient noise data thus has no bearing on the noise

## Responses to Comments – Individuals

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impacts analysis or results. The traffic impacts analysis used the traffic data provided by the traffic analysis for the project, and has no connection with the ambient noise levels measured. Although it is believed that the noise measurements conducted on January 16 fairly represent typical noise conditions, in an abundance of caution noise measurements were carried out again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session. As shown below, the measurement results were generally similar. At receivers R1, R2, R4 and R5, the measured ambient noise levels were 1 to 2 decibels lower on April 27. At receiver R3, the measured ambient noise level was approximately 5 decibels lower than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. To summarize, the results of the ambient noise measurements stand on their own and do not have an effect on the noise impacts analysis or the impacts conclusions.

### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Section 4.11.3.1 (Existing Environmental Setting), noise measurement location R3 was on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department. With regards to potential noise effects from Phase III, any such effects are not an issue because SDSU no longer plans to pursue the development of Phases II and III, so no further response to this comment is necessary.

- I43-13** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. Because the proposed project has been modified and no longer includes Phase III, there will be no significant and unavoidable traffic impacts. Please see Final EIR, Preface, for additional information regarding the project modifications. As to the comments regarding greenhouse gases and criteria pollution, EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas

## Responses to Comments – Individuals

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Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I43-14** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I43-15** The comment is a conclusion statement referencing previous comments. No further response is required.

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### Comment Letter I44

From: **Save Aztec Canyon** <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)>  
Date: Fri, Jun 2, 2017 at 5:33 PM  
Subject: Thank you for helping save Aztec Canyon  
To: [mnelson@gmail.com](mailto:mnelson@gmail.com), [residents.college.area@gmail.com](mailto:residents.college.area@gmail.com), [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@calstate.edu](mailto:TWhite@calstate.edu), [TrusteeSecretariat@calstate.edu](mailto:TrusteeSecretariat@calstate.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

Letter from the concerned residents of the College Area.

**Name** Barbara Filner

**Address** 5358 Saxon St.

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I44-1

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I44-2

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I44-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Clmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I44-4

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I44-5

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

144-6

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

144-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

144-8

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further,

144-9

## Responses to Comments – Individuals

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according to the City of San Diego, “San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing; or otherwise are considered sensitive.” SDSU’s brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

↑  
144-9  
Cont.

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

144-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSU’s construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

144-11

9. SDSU’s analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU’s Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSU’s models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU’s maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime

144-12  
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## Responses to Comments – Individuals

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noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

↑ I44-12  
Cont.

10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I44-13

11. SDSUs President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

I44-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

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## **Response to Comment Letter I44**

**Barbara Filner**

**June 2, 2017**

**I44-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department’s as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I44-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I44-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I44-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I44-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I44-6** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I44-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I44-8** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I44-9** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I44-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I44-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment apply do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the EIR, the project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I44-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I44-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I44-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter I45

From: **John Armantrout** <[John.armantrout@cox.net](mailto:John.armantrout@cox.net)>  
Date: Sun, Jun 4, 2017 at 4:50 PM  
Subject: Aztec Canyon  
To: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

Ms. Shinn,

I submitted some comments on the proposed development of the canyon with dorms. I also wanted to let you know that I REGULARLY see cars stopped/parked on Remington Rd in front of the current dorm there. Almost every time I drive by, there are cars stopped there. I have to go into the oncoming traffic lane to get past the stopped / parked cars. It is a red zone. Cars, delivery vans, trucks, etc are not supposed to be stopping or parking there. I realize you do not have the power to control everyone and you probably do not sanction or condone the folks doing this – but SDSU is responsible because you do NOT provide any loading or unloading zone for the hundreds of students in the current dorm – you are partly responsible because of this.

I45-1  
I45-2

Now, imagine that x4 if you build the new dorms in the canyon. From the drawings I saw, there will still be NO loading / unloading zone and YOUR students will continue to stop and park on Remington. The truck that makes deliveries to your store right there also stop and unload on Remington – in a red zone. And cars have to cross into the oncoming traffic lane to get by them – on a public street.

I45-3

It is only a matter of time before there is a serious accident on Remington – caused by SDSU's negligence for not having a loading/unloading zone – and the person doing the illegal stopping. I can assure you that SDSU would be named in the lawsuit resulting from this. You have 14 other spots on campus where you could build dorms – and have plenty of off street parking and loading/unloading. Wouldn't it be better to plan for that now – instead of planning on a lawsuit? Cheaper too...

I45-4  
I45-5

John T. Armantrout  
5059 College Gardens Ct.  
San Diego, CA, 92115  
[619-392-9787](tel:619-392-9787)

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**Response to Comment Letter I45**

**John T. Armantrout**

**June 4, 2017**

- I45-1** The comment is acknowledged and appreciated. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I45-2** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The Project's impacts relative to Remington Road and on campus drop off were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I45-3** The comment addresses, generally, environmental impacts that received extensive analysis in the Draft EIR. The Project's impacts relative to Remington Road and on campus drop off were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft and Final EIR. The proposed project includes a move-in/move out zone on the north side of the new building, as the comment suggests, and also includes off-road spaces in front of the new building for up to six vehicles for pick-up/drop off purposes, which will eliminate the existing problem of pick-up/drop off vehicles blocking one lane of traffic on Remington Road. Please see Final EIR Project Description Figure 2-11, Proposed Vehicular Access, for illustration of the move-in/move-out and pick-up/drop-off zones. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I45-4** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The Project's impacts relative to Remington Road and on campus drop off were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I45-5** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated,

## **Responses to Comments – Individuals**

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and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

## Responses to Comments – Individuals

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### Comment Letter I46

From: <[rcnstn@cox.net](mailto:rcnstn@cox.net)>  
Date: Sat, Jun 3, 2017 at 6:34 PM  
Subject: Formal comments for SDSU New Student Housing Project Draft Environmental Impact Report (4/21/17) (#3)  
To: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

Dawn Reser  
5118 Bixel Dr.  
San Diego, CA 92115  
[rcnstn@cox.net](mailto:rcnstn@cox.net)

June 3, 2017

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal comments for SDSU New Student Housing Project Draft Environmental Impact Report (4/21/17) (#3)

I attended the January 18 project scoping meeting held during the Notice of Preparation (NOP) comment period of December 8, 2016 through January 20, 2017, and was extremely motivated to express my concerns regarding the new student housing project represented by the current Draft Environmental Impact Report. I also gave a verbal statement to the court reporter in attendance at this meeting.

I46-1

My husband and I prepared a letter that night and mailed it via US Mail to you the next day (January 19). Apparently our letter did not arrive to you in time to be posted on the SDSU website <https://newscenter.sdsu.edu/chapultepec-info/public-comments.aspx> with the other letters received, one as late as January 23.

I46-2

I hereby submit this letter, attached as a PDF including our signatures, as part of my formal comments regarding the Draft Environmental Impact Report. I would appreciate an acknowledgement of the receipt of this email submission as formal comments to the Draft Environmental Impact Report.

I46-3

Thank you.

## Responses to Comments – Individuals

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Sincerely,

Dawn Reser

## Responses to Comments – Individuals

1/18/2017

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California 92182-1624  
lshinn@mail.sdsu.edu

Dear Ms. Shinn:

We write to express our concerns regarding the proposed freshman student housing project on the west side of SDSU adjacent to Chapultepec Hall. While we are supportive of on-campus housing for SDSU students, the project currently planned is too large for the site and will create dangerous traffic congestion, negatively impact the residential neighborhood of College View Estates in a variety of ways, and destroy animal and plant habitats. There are other sites on SDSU property that can be developed in order to lessen the project size and negative impact of the Chapultepec Hall project.

I 146-4  
I 146-5  
I 146-6

First, currently during move-in and move-out days for Chapultepec, Remington Road becomes unsafe for bicyclists and motorists to use because the students stop to unload/load in the bike lane and no parking fire zone. The plan for the Chapultepec Hall project does not include an off-street area for move-in and move-out days, thus all students will continue to use Remington Road as their loading zone. While there may be plans to provide a new access road on the north side of Chapultepec, Remington Road will continue to be an irresistibly convenient place to drop off and pick up passengers. Most importantly, emergency vehicles will not have a safe and expedient access to College View Estate or to the residence halls.

I 146-7  
I 146-8

Second, College View Estates properties will be negatively impacted by the high density of people and facilities proposed in this project in a variety of ways:


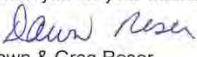
- Resident students will flood the neighborhood to park overnight. The plan does not show that existing campus parking facilities can accommodate the cars of the increased population
- The close proximity of the multi-story buildings will block sunlight to adjacent single-family residences.
- The planned roof-top gathering venues will broadcast noise and light pollution into the neighborhood and beyond.

I 146-9  
I 146-10  
I 146-11  
I 146-12

Third, the project calls for the cantilevering of four multi-story buildings into a canyon that is already considered a protected habitat. SDSU in the past has said the protected habitat was the reason they could not trim overgrown vegetation in the canyon, but this plan would do more than disturb the vegetation in the canyon. The preservation of habitats and open natural land should continue to be important to SDSU, and an alternative plan that includes non-destruction of the canyon needs to be created.

I 146-13

Thank you for your consideration of our concerns.

  
Dawn & Greg Reser  
5118 Bixel Dr.

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**Response to Comment Letter I46**

**Dawn Reser**

**June 3, 2017**

- I46-1** The comment is an introduction to comments that follow. No further response is required.
- I46-2** The comment is an introduction to comments that follow. No further response is required.
- I46-3** The comment is an introduction to comments that follow. No further response is required.
- I46-4** The comment is an introduction to comments that follow. No further response is required.
- I46-5** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I46-6** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I46-7** The comment addresses general subject areas, which received extensive analysis in the EIR. The Project's impacts relative to Remington Road and on campus move in were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft and Final EIR. The proposed project includes a move-in/move out zone on the north side of the new building, as the comment suggests, and also includes off-road spaces in front of the new building for up to six vehicles for pick-up/drop off purposes, which will eliminate the existing problem of pick-up/drop off vehicles blocking one lane of traffic on Remington Road. Please see Final EIR Project Description Figure 2-11, Proposed Vehicular Access, for illustration of the move-in/move-out and pick-up/drop-off zones. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I46-8** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The Project's impacts relative to Remington Road were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft and Final EIR. Please also see response to comment I46-7 for additional information responsive to this comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

## Responses to Comments – Individuals

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**I46-9** The comment addresses general subject areas, which received extensive analysis in the EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I46-10** The comment states that the College View Estates neighborhood will be negatively impacted as a result of resident students “flooding the neighborhood to park overnight.” The subject of parking, generally, and spillover parking in the College View Estates neighborhood, specifically, was addressed in in Section 4.14, Transportation/Circulation and Parking, subsection 4.14.6.4 of the Draft and Final EIR. The comment addresses the subject in a general manner and does not raise any specific issue regarding the adequacy of the EIR analysis and, as such, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I46-11** Shading and shadow impacts of the Project are also addressed in Section 4.1, Aesthetics, and in the Shading Technical Report prepared for the Project. Based on the technical report, the Project would not cast shadow onto shadow-sensitive for a duration in excess of the established significance thresholds throughout the year. Therefore, Project generated shadow was determined to be less than significant.

Please also refer to I107-105 regarding shadow and shading effects significance thresholds used in the EIR.

**I46-12** The comment claims that the Project would result in increased noise from exterior use areas (specifically the residential park overlooking the canyon and the outdoor courtyards).

The proposed residential park would be located to the east of the existing Chapultepec Hall, and west of the proposed project. Chapultepec Hall would be between the park area and the residences located to the west and northwest, and would thus provide substantial levels of visual and acoustical shielding at these existing residences. Additionally, the proposed courtyards would be located in between the proposed residence halls, again providing substantial visual and acoustical shielding to the nearby existing residences.

The commentator expresses their opinion regarding the lighting impacts of the Project. Project impacts concerning substantial new sources of lighting and nighttime views are addressed in Section 4.1, Aesthetics and in the Lighting Technical Report prepared for the Project. The results of the lighting analysis demonstrate that light trespass associated with the operation of project lighting would be below the

## Responses to Comments – Individuals

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significance threshold of 0.74-footcandle as measured at adjacent residential property lines to the west of the Project site. As stated in Section 4.1, Project lighting must conform to the requirements of CALGreen, which stipulates the light from project building and general site lighting must not exceed 0.74-footcandle at the project boundary. Based on the analysis presented in Section 4.1 and the Lighting Technical Report, the Draft EIR determined that Project impacts related to lighting would be less than significant and would not require mitigation.

- I46-13** See Biological Resources Thematic Response, which states that Phases II and III will not be developed. Phase III included the most severe impacts to the canyon. Phase I is still proposed as part of the Project does not impact the canyon. With these modifications, the Project will not result in significant unavoidable impacts, and all environmental impacts will be mitigated to less than significant.

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### Comment Letter I47

From: <[rcnstn@cox.net](mailto:rcnstn@cox.net)>  
Date: Sat, Jun 3, 2017 at 6:25 PM  
Subject: Formal Comments for SDSU New Student Housing Project Draft Environmental Impact Report (4/21/17) (#1)  
To: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@calstate.edu](mailto:TWhite@calstate.edu), [TrusteeSecretariat@calstate.edu](mailto:TrusteeSecretariat@calstate.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu), [mccollins@mail.sdsu.edu](mailto:mccollins@mail.sdsu.edu)

Dawn Reser  
5118 Bixel Dr.  
San Diego, CA 92115  
[rcnstn@cox.net](mailto:rcnstn@cox.net)

June 3, 2017

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU New Student Housing Project Draft Environmental Impact Report (4/21/17) (#1)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped; biologically sensitive; very high fire hazard canyon (hereafter "Aztec Canyon") directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016; and failed to disclose this "reasonably foreseeable" project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I47-1

SDSU's DEIR is insufficient and fails to identify all significant effects; alternatives; and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I47-2

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this; or any related student housing project and be compliant with the letter and spirit of CEQA:

I47-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings; yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule

I47-4

of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options; SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis; and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed; \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

147-4  
Cont.

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010; well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives; scoring; methodology; analyses; conclusions; and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

147-5

3. Environmental Justice dictates that the DEIR's Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example; Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process; the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable; irreversible significant impacts that can be mitigated through environmentally-responsible planning.

147-6

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved; a campus plan that included the demolition of the two lowest ranked campus dorms; Maya/Olmeca; and their replacement with two towers totaling 1,600

147-7

students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed; brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

↑ 147-7  
Cont.

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed; brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create un-mitigatable, significant, and irreversible changes. Lot U must be considered for maximum density construction only.

147-8

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers; red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego; "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered; threatened; or rare; proposed or candidates for listing; or otherwise are considered sensitive." SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

147-9

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable; significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield; disturbed; or redevelopment sites can be less than significant; depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield; disturbed and redevelopment sites from consideration (e.g.; the Campus Plan approved Maya/Olmeca redevelopment); SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield; disturbed; redevelopment; and potential acquisition/condemnation prior to resorting to the environmentally destructive; non-mitigatable; significant and irreversible destruction of any portion of Aztec Canyon.

147-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32; SB 32; SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSU's construction must use the highest mix possible of renewable natural gas; biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals; all

147-11  
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## Responses to Comments – Individuals

construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

147-11  
Cont.

9. SDSU's analysis of noise impacts is inadequate; must be conducted de novo; and significant impacts remain and must be discontinued or mitigated. According to SDSU's Appendix J; it conducted ambient noise level analysis on January 16, 2017; the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location; and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSU's models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU's maintenance of stationary noise sources is inadequate; as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym; further leading to significant impacts.

147-12

10. SDSU's significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias; SDSU concludes that the project has unavoidable; significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further; the traffic analysis fails to adequately characterize the increase in greenhouse gasses and criteria pollution from the significant impacts; thus failing to monetize the health impacts of surrounding residents who will breathe the emissions from increased; slower moving traffic and the impacts on state of California greenhouse gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

147-13

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to un-mitigatable; irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: “In response to concerns expressed by the community and our local elected officials; I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns.”

147-14

I hope that all leaders of the CSU system will recognize the detriment this project will unleash on the wonderful canyon and surrounding neighborhood and withhold their approval until appropriate modifications have been made.

147-15

Sincerely;

Dawn Reser



**Response to Comment Letter I47**

**Dawn Reser**

**June 3, 2017**

**I47-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I47-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I47-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I47-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I47-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I47-6** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I47-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I47-8** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I47-9** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I47-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I47-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I47-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I47-13** The significant and unavoidable traffic impacts referenced in the comment would only occur with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I47-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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### Comment Letter I48

From: **Save Aztec Canyon** <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)>  
Date: Fri, Jun 2, 2017 at 8:56 PM  
Subject: Thank you for helping save Aztec Canyon  
To: [mnelson@gmail.com](mailto:mnelson@gmail.com), [residents.college.area@gmail.com](mailto:residents.college.area@gmail.com), [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@calstate.edu](mailto:TWhite@calstate.edu), [TrusteeSecretariat@calstate.edu](mailto:TrusteeSecretariat@calstate.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

Letter from the concerned residents of the College Area.

<b>Name</b>	Ethan crock
<b>Address</b>	12778 Horizon trail
<b>Phone number</b>	<a href="tel:7204542406">7204542406</a>

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

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I48-1

## Responses to Comments – Individuals

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148-2

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148-3

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148-5



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148-10

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10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community’s cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I48-13

11. SDSUs President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman’s statement from May 8, 2017 follows: “In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns.”

I48-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

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## **Response to Comment Letter I48**

**Ethan Crock**

**June 2, 2017**

**I48-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I48-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I48-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I48-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I48-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I48-6** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I48-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I48-8** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I48-9** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I48-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I48-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation do not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I48-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.



### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer include the development of Phases II and III.

**I48-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I48-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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### Comment Letter I49

From: **Save Aztec Canyon** <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)>  
Date: Fri, Jun 2, 2017 at 9:21 PM  
Subject: Thank you for helping save Aztec Canyon  
To: [mnelson@gmail.com](mailto:mnelson@gmail.com), [residents.college.area@gmail.com](mailto:residents.college.area@gmail.com), [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@calstate.edu](mailto:TWhite@calstate.edu), [TrusteeSecretariat@calstate.edu](mailto:TrusteeSecretariat@calstate.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

Letter from the concerned residents of the College Area.

<b>Name</b>	Melissa
<b>Address</b>	5478 Mary Lane

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

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| Cont.

10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

| I49-13

11. SDSUs President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

| I49-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

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**Response to Comment Letter I49**

**Melissa  
June 2, 2017**

**I49-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I49-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I49-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I49-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I49-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
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- I49-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
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The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

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and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because the proposed project has been modified and no longer includes the development of Phases II and III.

**I49-13** The significant and unavoidable traffic impacts referenced in the comment would only occur with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I49-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter I50

On Fri, Jun 2, 2017 at 9:29 PM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

Name	Jaden
Address	<a href="mailto:Jadenmattern9@gmail.com">Jadenmattern9@gmail.com</a>
Phone number	<a href="tel:3039097480">3039097480</a>

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I50-1

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts

I50-2

that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

150-2  
Cont.

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

150-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

150-4

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

150-5



## Responses to Comments – Individuals

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3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSUs website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires “a distinct west campus housing neighborhood similar to ... the east side of campus” (eliminates/diminishes east campus solutions) and Objective 2 requires “alleviate isolation of Chapultepec” and Objective 6 requires exploitation of “an existing undeveloped area”. When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

150-6

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

150-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSUs own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

150-8

6. SDSUs biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, “San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or

150-9

candidates for listing; or otherwise are considered sensitive.” SDSU’s brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

150-9  
Cont.

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

150-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSU’s construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

150-11

9. SDSU’s analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU’s Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSU’s models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU’s maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

150-12

## Responses to Comments – Individuals

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10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

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150-14

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// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
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**Response to Comment Letter I50**

**Jaden  
June 2, 2017**

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and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

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In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.



**Ambient Noise Measurements Comparison**

<b>Receiver</b>	<b>January 16 2017 Noise Measurement Data <math>L_{eq}</math> (dBA)</b>	<b>April 27 2017 Noise Measurement Data <math>L_{eq}</math> (dBA)</b>
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I50-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I50-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter I51

On Fri, Jun 2, 2017 at 10:12 PM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

**Name** Inbal Giron

**Address** 29160 Oakpath Dr. Agoura Hills CA, 91301

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I51-1

SDSUs DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I51-2

## Responses to Comments – Individuals

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The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I51-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I51-4

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I51-5

3. Environmental Justice dictates that the DEIR's Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any

I51-6

## Responses to Comments – Individuals

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area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires “a distinct west campus housing neighborhood similar to ... the east side of campus” (eliminates/diminishes east campus solutions) and Objective 2 requires “alleviate isolation of Chapultepec” and Objective 6 requires exploitation of “an existing undeveloped area”. When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I51-6  
Cont.

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I51-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I51-8

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, “San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing; or otherwise are considered sensitive.” SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I51-9

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I51-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSU’s construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

I51-11

9. SDSU’s analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU’s Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSU’s models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU’s maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I51-12

10. SDSU’s significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be

I51-13

## Responses to Comments – Individuals

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accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I51-13  
Cont.

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

I51-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

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## **Response to Comment Letter I51**

**Inbal Giron**

**June 2, 2017**

**I51-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I51-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I51-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I51-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I51-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I51-6** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I51-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I51-8** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I51-9** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I51-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since the release of the Draft EIR, the project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I51-11** The comment claims that the non-renewable energy use associated with Project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from Project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the Project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I51-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

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**I51-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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### Comment Letter I52

On Sat, Jun 3, 2017 at 2:05 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

#### Untitled Section

<b>Name</b>	Mark Nelson
<b>Address</b>	5417 Hewlett Drive, San Diego, CA 92115
<b>Comments</b>	These comments represent a portion of my overall comments to the SDSU DEIR on the West Campus residence halls.

I52-1

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I52-2

## Responses to Comments – Individuals

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I52-3

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I52-4

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I52-5

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I52-6



objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

↑ I52-6  
Cont.

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I52-7

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I52-8

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I52-9

## Responses to Comments – Individuals

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6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing, or otherwise are considered sensitive." SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I52-10

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I52-11

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSU's construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption.

I52-12

9. SDSU's analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU's Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and

I52-13

## Responses to Comments – Individuals

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constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I52-13  
Cont.

10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community’s cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I52-14

11. SDSUs President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman’s statement from May 8, 2017 follows: “In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns.”

I52-15

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

## Responses to Comments – Individuals

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INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

## **Response to Comment Letter I52**

**Mark Nelson**

**June 3, 2017**

**I52-1** The comment is an introduction to comments that follow. No further response is required.

**I52-2** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings.

As to the comment regarding biological sensitivity, the EIR fully analyzed the potential impacts of the proposed project relative to biological resources. Moreover, in response to public comments, the proposed project has been modified to eliminate development of Phases II and III. Therefore, the proposed project would not result in direct impacts to the canyon. Please see Final EIR, Preface, for additional information regarding the project modifications, and the Biological Resources Thematic Response for additional information responsive to the comment.

## Responses to Comments – Individuals

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- I52-3** The comment that the EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the EIR. Please see the Alternatives Thematic Response for information regarding the EIR’s alternatives analysis. As to the comment regarding the sufficiency of the EIR, the comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I52-4** The comment is an introduction to comments that follow. No further response is required.
- I52-5** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I52-6** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I52-7** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I52-8** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007

## Responses to Comments – Individuals

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Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment. Please also see the response to comment I52-5 regarding the elimination of Phases II and III, which, correspondingly, results in the elimination of direct impacts to the canyon.

**I52-9** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.

**I52-10** The comment regards the surveys conducted in support of the EIR’s analysis of the project’s impacts relative to biological resources. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I52-11** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, as previously noted, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I52-12** The comment claims that the non-renewable energy use associated with Project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The several of the legislative bills listed in the comment regard the analysis of greenhouse gas emissions, which are comprehensively addressed in EIR Section 4.7, Greenhouse Gas Emissions. Moreover, the state will create mandates based on this legislation, which will then apply to the California State University and, in turn SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the EIR, the Project would not result in a

significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project's operational inventory. Also, the Project was shown to be consistent with the applicable climate action plan, which requires project features to reduce GHGs. The Project also does not use "unusual levels" of energy. The carbon reductions cited in the comment refer to those outlined in the State's Scoping Plan, which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

- I52-13** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the "constructive interference of the proposed Phase III building design," and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the Project, and, therefore, the analysis traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.



## Responses to Comments – Individuals

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis

**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, the proposed project has been modified and no longer includes the development of Phases II or III.

**I52-14** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be

## Responses to Comments – Individuals

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included as part of the record and made available to the decision makers prior to a final decision on the Project.

- I52-15** The comment regarding President Hirshman’s May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project’s significant environmental impacts will be reduced to less than significant.

### Comment Letter I53

On Sat, Jun 3, 2017 at 5:56 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

#### Untitled Section

**Name** Tyrone & Linda Goodwin

**Address** 5409 redding rd

**Phone number** [6193794553](tel:6193794553)

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I53-1

## Responses to Comments – Individuals

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SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I53-2

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I53-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I53-4

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as

I53-5

objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I53-5  
Cont.

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I53-6

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I53-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I53-8

## Responses to Comments – Individuals

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I53-9

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I53-10

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I53-12

## Responses to Comments – Individuals

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I53-12  
Cont.

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I53-13

11. SDSUs President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman’s statement from May 8, 2017 follows: “In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns.”

I53-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

## Responses to Comments – Individuals

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INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES



## **Response to Comment Letter I53**

**Tyrone and Linda Goodwin**

**June 3, 2017**

**I53-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I53-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I53-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I53-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I53-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
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**I53-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

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The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the Project’s operational inventory. Also, the project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

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and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

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As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
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As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I53-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I53-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter I54

From: **Save Aztec Canyon** <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)>  
Date: Sat, Jun 3, 2017 at 6:49 AM  
Subject: Thank you for helping save Aztec Canyon  
To: [mnelson@gmail.com](mailto:mnelson@gmail.com), [residents.college.area@gmail.com](mailto:residents.college.area@gmail.com), [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu),  
[TWhite@calstate.edu](mailto:TWhite@calstate.edu), [TrusteeSecretariat@calstate.edu](mailto:TrusteeSecretariat@calstate.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu),  
[PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu), [mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

Letter from the concerned residents of the College Area.

#### Untitled Section

<b>Name</b>	Kien lieu
<b>Address</b>	5161 college gardens court
<b>Phone number</b>	<a href="tel:6195071397">6195071397</a>
<b>Comments</b>	Save Aztec canyon

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

## Responses to Comments – Individuals

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SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I54-1

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I54-2

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I54-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I54-4



## Responses to Comments – Individuals

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2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I54-5

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I54-6

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I54-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only

I54-8

## Responses to Comments – Individuals

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placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I54-8  
Cont.

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergirding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare, proposed or candidates for listing; or otherwise are considered sensitive." SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I54-9

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I54-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSU's construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions

I54-11

## Responses to Comments – Individuals

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by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

↑ I54-11  
Cont.

9. SDSU's analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU's Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSU's models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU's maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I54-12

10. SDSU's significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I54-13

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: “In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns.”

I54-14

Sincerely,

## Responses to Comments – Individuals

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// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

**Response to Comment Letter I54**

**Kien Lieu  
June 3, 2017**

**I54-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I54-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I54-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I54-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I54-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

INTENTIONALLY LEFT BLANK

### Comment Letter I55

On Sat, Jun 3, 2017 at 7:49 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

#### Untitled Section

**Name** Ninh Dao

**Address** 5333 Redding Road

**Phone number** [6198088667](tel:6198088667)

**Comments** Please think and act responsibly. In the name of higher education institution please please show some care for social good and wisdom.

I55-1

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

## Responses to Comments – Individuals

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Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I55-2

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I55-3

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I55-4

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I55-5

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west

I55-6

campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I55-6  
Cont.

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I55-7

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I55-8

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing

I55-9

## Responses to Comments – Individuals

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students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

↑ I55-9  
Cont.

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing, or otherwise are considered sensitive." SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I55-10

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I55-11

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSU's construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption.

I55-12

## Responses to Comments – Individuals

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9. SDSU's analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU's Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the "fan shape" of the proposed Phase III construction. SDSU's models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU's maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I55-13

10. SDSU's significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breathe the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I55-14

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

I55-15

Sincerely,

// Name at top of document is submitters name

## Responses to Comments – Individuals

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FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES



**Response to Comment Letter I55**

**Ninh Dao  
June 3, 2017**

**I55-1** The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

**I55-2** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I55-3** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment

## Responses to Comments – Individuals

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will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I55-4** The comment is an introduction to comments that follow. No further response is required.

**I55-5** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I55-6** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I55-7** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.

**I55-8** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.

## Responses to Comments – Individuals

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- I55-9** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I55-10** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.
- I55-11** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I55-12** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects.

## Responses to Comments – Individuals

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The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

- I55-13** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,” and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on

## Responses to Comments – Individuals

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the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I55-14** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I55-15** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed

## **Responses to Comments – Individuals**

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project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

### Comment Letter I56

On Sat, Jun 3, 2017 at 9:14 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

#### Untitled Section

<b>Name</b>	Maddi Baird
<b>Address</b>	<a href="mailto:maddibaird@ymail.com">maddibaird@ymail.com</a>
<b>Phone number</b>	<a href="tel:9492755191">9492755191</a>

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I56-1

## Responses to Comments – Individuals

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I56-2

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I56-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I56-4

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I56-5



objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I56-5  
Cont.

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I56-6

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I56-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I56-8

## Responses to Comments – Individuals

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6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing, or otherwise are considered sensitive." SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I56-9

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I56-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSU's construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption.

I56-11

9. SDSU's analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU's Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and

I56-12

## Responses to Comments – Individuals

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constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I56-12  
Cont.

10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community’s cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I56-13

11. SDSUs President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman’s statement from May 8, 2017 follows: “In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns.”

I56-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

## Responses to Comments – Individuals

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INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

## **Response to Comment Letter I56**

**Maddi Baird**

**June 3, 2017**

**I56-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period..

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I56-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I56-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I56-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I56-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I56-6** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I56-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I56-8** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I56-9** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I56-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I56-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I56-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.



### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III..

**I56-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I56-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter I57

On Sat, Jun 3, 2017 at 9:28 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

#### Untitled Section

**Name** Paul D. Quill

**Address** 5341 Redding Road, San Diego 92115

**Phone number** [760-834-5505](tel:760-834-5505)

**Comments** Traffic Impacts are not un-mitigatable. At the very least a full time guarded gate on Remington entering College View Estates paid for by SDSU for a contract of a minimum of 30 years would at least relieve the pressure on student and construction access into the community. Scenic impacts are not unmitigable if height is reduced at or below existing high rise. The whole thing is fullish.

I57-1

I57-2

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

## Responses to Comments – Individuals

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SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I57-3

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I57-4

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I57-5

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I57-6

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I57-7

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I57-8

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I57-9

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only

I57-10

## Responses to Comments – Individuals

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placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I57-10  
Cont.

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergirding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare, proposed or candidates for listing; or otherwise are considered sensitive." SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I57-11

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I57-12

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSU's construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions

I57-13

## Responses to Comments – Individuals

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by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

↑ I57-13  
Cont.

9. SDSU's analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU's Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSU's models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU's maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I57-14

10. SDSU's significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I57-15

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: “In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns.”

I57-16

Sincerely,

## Responses to Comments – Individuals

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// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES



### Response to Comment Letter I57

**Paul D. Quill**

**June 3, 2017**

- I57-1** The comment addresses general subject areas, which received extensive analysis in the ~~draft environmental documentation~~ EIR. The Project's impacts relative to traffic were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft EIR. Also, the comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I57-2** The commentator expresses concerns over impacts to scenic vistas due to development of the Project. While the canyon landscape adjacent to and encompassing a portion of the Project site displays scenic qualities, views from private residences and on-campus dormitories to the canyon are not considered scenic vista. Private views from residences to the canyon are not specifically protected under CEQA and SDSU students residing in on-campus dormitories are not considered sensitive receptors. For the purposes of the Draft EIR, scenic vistas are public vantage points offering broad and particularly long views to valued scenic resources in the area. As stated in the Draft EIR, the presence of scenic vistas in the surrounding area is generally limited (due to development and vegetation that tends to impede the availability of more distant views) and consists primarily of views to and from prominent terrain location in Mission Trails Regional Park. Views to and from prominent terrain location in Mission Trails Regional Park and the Project are analyzed in Section 4.1.6, Impacts Analysis, of the Draft EIR. While views of the canyon landscape are not addressed in the scenic vista analysis, the introduction of the Project and impacts to the existing visual character and quality of the site and surrounding area is addressed in the Draft EIR. The Draft EIR determined that that Project (in particular, Phase III development and the proposed scale of Phase II development) impacts to existing visual character and quality of the site and surrounding area would be significant and unavoidable. However, as explained in the Final EIR, the proposed project has been modified to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As described in Section 4.1, Aesthetics, of the Final EIR, all impacts to existing visual character would be less than significant.
- I57-3** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall "since at least 2010." The reference to 2010 is based

on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project's Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project's new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

- I57-4** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I57-5** The comment is an introduction to comments that follow. No further response is required.
- I57-6** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, please see the Alternatives Thematic Response for

## Responses to Comments – Individuals

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- information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I57-7** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I57-8** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I57-9** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I57-10** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I57-11** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.
- I57-12** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources,

including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

- I57-13** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

- I57-14** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,” and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

<b>Receiver</b>	<b>January 16 2017 Noise Measurement Data <math>L_{eq}</math> (dBA)</b>	<b>April 27 2017 Noise Measurement Data <math>L_{eq}</math> (dBA)</b>
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I57-15** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I57-16** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

### Comment Letter I58

On Sat, Jun 3, 2017 at 9:31 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

#### Untitled Section

<b>Name</b>	Patricia phithamuna
<b>Address</b>	319 Tacoma blvd s pacific WA
<b>Phone number</b>	<a href="tel:8082842949">8082842949</a>

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I58-1

## Responses to Comments – Individuals

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SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

158-2

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

158-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

158-4

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as

158-5



## Responses to Comments – Individuals

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objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I58-5  
Cont.

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I58-6

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I58-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I58-8

## Responses to Comments – Individuals

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6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing, or otherwise are considered sensitive." SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

158-9

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

158-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSU's construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption.

158-11

9. SDSU's analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU's Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and

158-12

## Responses to Comments – Individuals

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constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I58-12  
Cont.

10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community’s cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I58-13

11. SDSUs President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman’s statement from May 8, 2017 follows: “In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns.”

I58-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

## Responses to Comments – Individuals

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INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

## **Response to Comment Letter I58**

**Patricia Phithamma**

**June 3, 2017**

**I58-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I58-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I58-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I58-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
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- I58-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
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**I58-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I58-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The project is in compliance with all applicable regulations at the time of this writing.

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and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

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As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I58-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I58-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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### Comment Letter 159

On Sat, Jun 3, 2017 at 10:27 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

#### Untitled Section

<b>Name</b>	John P Bleicher
<b>Address</b>	5175 Bixel Drive
<b>Phone number</b>	<a href="tel:(619)583-5159">(619) 583-5159</a>

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[L.Shinn@mail.sdsu.edu](mailto:L.Shinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

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159-1  
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## Responses to Comments – Individuals

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SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I59-2

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I59-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I59-4

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as

I59-5

## Responses to Comments – Individuals

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objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I59-5  
Cont.

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to . . . the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I59-6

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I59-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I59-8

## Responses to Comments – Individuals

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6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing, or otherwise are considered sensitive." SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I59-9

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I59-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSU's construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption.

I59-11

9. SDSU's analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU's Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and

I59-12

## Responses to Comments – Individuals

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constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I59-12  
Cont.

10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community’s cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I59-13

11. SDSUs President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman’s statement from May 8, 2017 follows: “In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns.”

I59-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

## Responses to Comments – Individuals

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INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES



**Response to Comment Letter I59**

**John P. Bleicher**

**June 3, 2017**

**I59-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period..

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I59-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I59-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I59-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I59-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I59-6** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives ~~Locations~~ Thematic Response for additional information responsive to the comment.
- I59-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I59-8** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I59-9** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I59-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I59-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I59-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

<b>Receiver</b>	<b>January 16 2017 Noise Measurement Data <math>L_{eq}</math> (dBA)</b>	<b>April 27 2017 Noise Measurement Data <math>L_{eq}</math> (dBA)</b>
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

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**I59-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and the comments submitted on the Draft EIR, the proposed Project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter I60

On Sat, Jun 3, 2017 at 12:14 PM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

<b>Name</b>	Monica Lewis
<b>Address</b>	5074 College Avenue, SD

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I60-1

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I60-2

## Responses to Comments – Individuals

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The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I60-3

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I60-5

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I60-6



## Responses to Comments – Individuals

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area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires “a distinct west campus housing neighborhood similar to ... the east side of campus” (eliminates/diminishes east campus solutions) and Objective 2 requires “alleviate isolation of Chapultepec” and Objective 6 requires exploitation of “an existing undeveloped area”. When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I60-6  
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I60-7

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I60-9

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I60-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSU’s construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

I60-11

9. SDSU’s analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU’s Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSU’s models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU’s maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I60-12

10. SDSU’s significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be

I60-13

## Responses to Comments – Individuals

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accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I60-13  
Cont.

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

I60-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

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## **Response to Comment Letter I60**

**Monica Lewis**

**June 3, 2017**

**I60-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I60-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I60-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I60-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I60-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I60-6** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I60-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I60-8** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I60-9** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I60-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I60-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I60-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.



**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I60-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I60-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed Project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

### Comment Letter I61

On Sat, Jun 3, 2017 at 1:04 PM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

**Name** Richard Fox

**Address** 5416 Redding Road, San Diego, CA 92115

**Phone number** [619-807-8800](tel:619-807-8800)

Dear Ms. Shinn,

Thank you for the opportunity to respond to SDSU's plans to build a huge dorm complex on Remington Road. I have been a resident of College View Estates (CVE) since 1998. First, I wish to state that I am very happy to hear that SDSU plans to build additional affordable housing for students on campus. However, the current plan has a number of issues that need to be resolved and two major problems that I hope SDSU will remove from its current plans.

**Comments** First, the plan to put all of the dorm rooms on Remington Road is a bad idea. I hope SDSU will reconsider the 2007 Master Plan which put some dorm rooms on Remington Road and others on the east end of the campus. Our neighborhood already suffers from the problems created by all the other venues that SDSU has built on 55th and Remington Road. This is already the most congested area on SDSU, as it is the main access route to large campus parking structures, Viejas Arena, the track and several fields, the Alumni Center, the Jacobs Jam Center, the gymnasium, the Aztec Recreation Center, the SDSU Police Department, the Albert's Apartment Complex and other apartments along 55th, the huge existing 870 bed Chapultepec Dorm, the baseball stadium, the softball stadium, the ARC Aquatic Center, the tennis center and is also the major access route to our College View Estates neighborhood.

I61-1

I61-2

I61-3

I61-4

## Responses to Comments – Individuals

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With some good planning and mitigations to improve traffic, parking, noise and other issues, I could see Phase 1 of the project being developed, but Phases 2 and 3 will make this massive development not compatible to be in an area already so congested which is so close to our single-family residential neighborhood and also along our major neighborhood access route.

I61-5

I would suggest that not all of the dorms be built on Remington Road and instead build Phases 2 & 3 in the areas identified in the 2007 Master Plan on the east end of the campus, and/or other locations such as the large parking areas off of Alvarado. If it is absolutely necessary to have all the new dorms in one place, I would suggest they be built on the far end of 55th where the Albert's Apartments and other apartments are currently located.

I61-6

I61-7

Before the Lapinsky family sold their properties to Aztec Shops, they had determined these low rise apartments were too old, outdated, too small and in need of maintenance to be operated efficiently and they planned to tear them down and build larger, more modern and efficient buildings. This would be an ideal place to build a larger, more modern student residence complex. I was told that SDSU doesn't want to displace current housing while building new housing. However, once Phase 1 was built, further construction could be built in stages with several buildings at a time being built while new students and displaced students from the old apartments are moved into the new larger buildings constructed on the site. This would be quite doable as all other phases of the current project are already planned to be built out over a number of years in the future.

I61-8

I61-9

Even if only Phase 1 is built on Remington Road, the design must be developed to not only mitigate new traffic, parking, noise and visual blight issues, but also alleviate the issues that already plague our neighborhood because of the lack of mitigation when SDSU built so many other venues in this area. Some mitigation efforts that I would suggest that will be needed even if SDSU only builds Phase 1 on Remington Road are:

I61-10

1. Build parking and areas for Parents and Students to unload and load their belongings at the beginning and end of each semester. Every semester, vehicles are parked in the red zone and make it challenging to drive along Remington. There is NO police enforcement during these times and there are NO other options. Before building, make room along the road or have parking underneath the Dorm Buildings.

I61-11

## Responses to Comments – Individuals

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2. Build entrance to College View Estates with a Guard House and a Gate that can be utilized during events.

I 61-12

3. Putting a parking enforcement officer or community service officer in the middle of the street with a sign and hand up is not efficient or safe for the public safety officer.

I 61-13

4. Synchronize the 5 traffic signals on 55th between Montezuma and Remington Road to better improve the flow of traffic.

I 61-14

5. Give non-student & non-faculty/staff members of ARC a sticker that allows them to park free on weekends and evenings after 7:00 PM in lots 10, 10A and parking structure 7, if large events are not taking place. This would help alleviate parking spill-over into our neighborhood when Area B parking restrictions are not in effect during times when the majority of classes are not in session and such areas are more available to those who are not currently parking in them.

I 61-15

6. Improve traffic exiting campus by restriping the intersection of 55th and Aztec Circle Drive to allow cars exiting the Albert's and other apartments at the end of 55th to turn left and also be able to exit via Aztec Circle Drive and Canyon Crest instead of only being able to exit on 55th.

I 61-16

7. Create additional parking under the buildings to be built on Lot 9, create a loading and unloading loop drive with its entrance and exit off of 55th and also create short term parking spaces for visitors, parents picking up and dropping off students, move-in/move-out, delivery vehicles, etc. This should become the only vehicle entrance/exit for the new and existing doms.

I 61-17

8. Repaint the red curbs along Remington Road, change the wording on the existing signs from "No Parking" to "Tow Away-No Stopping at Any Time", post more signs at shorter intervals and have campus police and SDPD aggressively enforce these restrictions.

I 61-18

9. Increase lighting at night along Remington Road to help vehicles better see bicyclists, skate boarders and pedestrians who are on or crossing the street and are wearing dark colors.

I 61-19

10. Design buildings so they minimize noise, trash in the canyons, shading & view issues for existing CVE neighbors and

I 61-20

## Responses to Comments – Individuals

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designing new buildings so there are not opening windows and there are no balconies or roof access areas.

↑ I61-20  
Cont.

11. Fence off canyon areas, post No Smoking and No Trespassing signs and enforce them to prevent students from smoking in the dangerous fire areas in the canyons.

I61-21

12. Provide a fire-safe smoking area for students so they do not have to smoke in canyons and on our residential streets.

I61-22

13. Work with the city to fast track the building of the fire department that the city has already deemed to be needed in the vicinity of 55th and Montezuma. With so many more students living on campus so close to fire prone canyons, SDSU should make every effort to see that fast, local emergency services are located nearby for the safety of students, faculty/staff and residents alike.

I61-23

14. Agree to continually monitor traffic, parking, noise and other issues during construction and continue to monitor such things after the project is complete to determine the need for further mitigations that were not implemented and/or do not resolve such issues. Commit to work with C'VEA to do other reasonable mitigations for such issues and other unanticipated consequences of growth by the University.

I61-24

Thank you for your attention to these matters. I hope SDSU will address my concerns and implement reasonable measures, as well as other reasonable ideas that may be suggested. By working cooperatively together, we can have a project that will benefit SDSU, your students, your College View Estates neighbors and the entire College Area. If I can help in any way or you wish to discuss anything further, please feel free to contact me.

I61-25

Sincerely,

Richard Fox  
5416 Redding Road  
San Diego, CA 92115

cell: [619.807.8800](tel:619.807.8800)

## Responses to Comments – Individuals

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Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I 61-26

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I 61-27

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I 61-28

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those

I 61-29

environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I61-29  
Cont.

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I61-30

3. Environmental Justice dictates that the DEIR's Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I61-31



## Responses to Comments – Individuals

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4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I61-32

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I61-33

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing; or otherwise are considered sensitive." SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I61-34

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting

I61-35

to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

↑ I61-35  
Cont.

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSUs construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

I61-36

9. SDSUs analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSUs Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I61-37

10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community’s cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I61-38

## Responses to Comments – Individuals

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11. SDSUs President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

I61-39

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

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**Response to Comment Letter I61**

**Richard Fox**

**June 3, 2017**

- I61-1** The comment is acknowledged and appreciated. The comment expresses general support for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I61-2** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I61-3** With respect to the comment regarding environmentally preferable siting choices and the proposed project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I61-4** With respect to the comment regarding environmentally preferable siting choices and the proposed project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I61-5** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

## Responses to Comments – Individuals

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- I61-6** With respect to the comment regarding environmentally preferable siting choices and the proposed project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see Alternatives Thematic Response for information responsive to the comment.
- I61-7** With respect to the comment regarding environmentally preferable siting choices and the proposed project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I61-8** With respect to the comment regarding environmentally preferable siting choices and the proposed project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.
- I61-9** With respect to the comment regarding environmentally preferable siting choices and the proposed project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to

## Responses to Comments – Individuals

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any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

- I61-10** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I61-11** The comment addresses the double-parking on Remington Road, generally, and requests that the Project include a student move-in/move-out area away from Remington to alleviate the congestion caused by these events. The Project includes off-street pull-off areas on Remington Road in front of the new buildings for up to six vehicles to accommodate pick-ups/drop-offs, and the installation of “No Stopping Any Time” signs to deter drivers from stopping their vehicles within the flow of traffic. Additionally, student move-ins/move-out will take place on the north side of the new building, far removed from Remington Road, thereby alleviating the related traffic congestion. (See Final EIR, Project Description, Figure 2-11 for illustration of the location of the pick-up/drop-off and move-in/move-out zones. See also/EIR Section 4.14, subsection 4.14.6.5, Access and Other Issues.)
- I61-12** The comment requests that the Project build an entrance to the College View Estates with a guard house and gate that can be utilized during special events. The Project includes the placement of a permanent sign on Remington Road at the SDSU campus boundary with the College View Estates neighborhood that reads “No SDSU or Event Parking in Residential Neighborhood – Violators May be Fined and/or Towed Away.” Traffic Posts will continue on Remington Road at the College View Estates entrance to discourage parking in the residential neighborhood during events at Viejas Arena, and during baseball games. A temporary sandwich board sign also will be placed at the corner of 55th Street and Remington Road during such events that reads “No Event Parking Beyond This Point.” For additional information responsive to this comment, please see EIR Section 4.14, Transportation/Circulation and Parking, College View Estates Spillover Parking.
- I61-13** The comment refers to the efforts taken by the university to prevent spillover parking in the College View Estates area and states that “putting a parking enforcement officer or community service officer in the middle of the street with a sign and hand up is not efficient or safe for the public safety officer.” The comment expresses the opinions of the commentator and does not raise an environmental issue and no further response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

## Responses to Comments – Individuals

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- I61-14** The comment suggests that the Project synchronize the traffic signals on 55th Street between Montezuma Road and Remington Road to improve the flow of traffic. As part of the Project, the university will work with the City to synchronize the referenced traffic signals. (See Draft EIR, Section 4.14, Transportation/Circulation and Parking, page 4.14-42.)
- I61-15** The comment suggests providing non-students and non-faculty/staff members of the Aztec Recreation Center with a sticker that allows them to park free on weekends and evenings in designated campus parking lots to alleviate parking spillover in the College View Estates neighborhood. As noted in response to comment I-61-12, the Project includes several measures to prevent spillover parking in the College View Estates neighborhood. Moreover, as discussed in the EIR, the College View Estates neighborhood lies within the City of San Diego’s Area B residential permit parking district, which means on-street parking is prohibited in certain areas (those areas near campus) Monday through Friday from 8 AM to 7 PM, except for vehicles displaying valid permits. SDSU students and other non-CVE residents are legally permitted to park on the streets only between the hours of 7 PM and 8 AM during the week, and on weekends. Changes to the existing parking permit program that may be desired by the CVE residents are beyond the scope of the Project.
- I61-16** The comment requests that the currently prohibited southbound left-turn movement at the 55th Street / Canyon Crest Drive/Aztec Circle Drive intersection be allowed. However, due to the skew in the intersection, providing the southbound left-turn movement is deemed unsafe. Since 55th Street and Canyon Crest Drive do not intersect at a 90 degree angle, it is not feasible to safely allow the southbound left-turn movement.
- I61-17** The comment suggests creating additional parking under the new buildings, and creating a pick-up/drop-off move-in/move out zone off of 55th Street. The Project includes a move-in/move out zone on the north side of the new buildings, as the comment suggests, and also includes off-road spaces in front of the buildings for up to six vehicles for pick-up/drop off purposes, which will eliminate the existing problem of pick-up/drop off vehicles blocking one lane of traffic on Remington Road. With respect to parking, the EIR analysis concluded that there is adequate parking on campus to meet any increased parking demand that may result with implementation of the proposed project and, therefore, no additional parking is necessary. (See Final EIR, Project Description, Figure 2-11 for illustration of the location of the pick-up/drop-off and move-in/move-out zones.)
- I61-18** The comment suggests re-painting the red curbs along Remington Road, changing the existing “No Parking” signage, posting more signs at shorter intervals, and increasing



- law enforcement of the signs. As discussed in the EIR Section 4.14, Transportation/Circulation and Parking, under the Project, the red curbs along Remington Road would be re-painted and the existing signs would be modified from “No Parking” to “No Stopping At Any Time.” Several signs would be posted at short intervals. Enforcement of the parking restrictions is within the jurisdiction of the City of San Diego Police Department, with supplemental law enforcement assistance provided by SDSU campus police, as necessary.
- I61-19** The commentator expresses their opinion regarding the lighting impacts of the Project. Project impacts concerning substantial new sources of lighting and nighttime views are addressed in EIR Section 4.1, Aesthetics, and in the Lighting Technical Report prepared for the Project. The results of the lighting analysis demonstrate that light trespass associated with the operation of Project lighting would be below the significance threshold of 0.74-footcandle as measured at adjacent residential property lines to the west of the Project site. As stated in Section 4.1, Aesthetics, Project lighting must conform to the requirements of CALGreen, which stipulates the light from project buildings and general site lighting must not exceed 0.74-footcandle at the project boundary. Based on the analysis presented in Section 4.1 and the Lighting Technical Report, the Draft EIR determined that Project impacts related to lighting would be less than significant and would not require mitigation.
- I61-20** The comment claims that the proposed project would result in increased noise from exterior use areas (specifically the residential park overlooking the canyon and the outdoor courtyards). The proposed residential park would be located to the east of the existing Chapultepec Hall, and west of the proposed project. Chapultepec Hall would be between the park area and the residences located to the west and northwest, and would thus provide substantial levels of visual and acoustical shielding at these existing residences. Additionally, the proposed courtyards would be located in between the proposed residence halls, again providing substantial visual and acoustical shielding to the nearby existing residences.
- I61-21** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. Please note that the entire SDSU campus is non-smoking and enforces violations of this policy through ticketing and fines. Multiple offenses could result in eviction of on-campus housing. Smoking complaints should be directed to the University Police, who will contact the on-duty residence hall coordinator to address the issue. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

## Responses to Comments – Individuals

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- I61-22** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. Please note that the entire SDSU campus is non-smoking and enforces violations of this policy through ticketing and fines. Multiple offenses could result in eviction of on-campus housing. Smoking complaints should be directed to the University Police, who will contact the on-duty residence hall coordinator to address the issue. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I61-23** The Project’s Fire Hazards were analyzed in the Fire Fuel Load Modeling Report (Dudek 2017). Based on the results of that evaluation, fire safety measures were developed to protect the proposed structures from wildfire threats, enable fire department access, and provide a defensible project. The adjacent Canyon is considered to include the potential for wildfire and that potential has been addressed through project design features and measures above and beyond City fire code requirements. Please also refer to response to comment I-17-30 for additional details on Project requirements for constructing in a very high fire hazard severity zone (VHFHSZ).
- I61-24** The comment addresses mitigation and mitigation monitoring related to general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I61-25** The comment is a conclusion to previous comments. No further response is required.
- I61-26** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

## Responses to Comments – Individuals

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- As to the comment regarding biology and fire hazards, as identified in the Project's Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project's new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.
- I61-27** The comment that the Draft EIR is "insufficient" and that there are "feasible alternatives" addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I61-28** The comment is an introduction to comments that follow. No further response is required.
- I61-29** The comment claims SDSU must delay the construction start date of the New Student Housing project "in order to remove environmental damages." The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding "non-mitigable and irreversible impacts," following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I61-30** The comment that SDSU must conduct "an unbiased environmental analysis" addresses general subject areas, which received extensive analysis in the Draft EIR.

## Responses to Comments – Individuals

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The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I61-31** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.

**I61-32** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.

**I61-33** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.

**I61-34** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I61-35** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I61-36** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from

regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California's carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project's operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use "unusual levels" of energy. The carbon reductions cited in the comment refer to those outlined in the State's Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I61-37** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the "constructive interference of the proposed Phase III building design," and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results.

## Responses to Comments – Individuals

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Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is

## Responses to Comments – Individuals

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no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I61-38** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I61-39** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed Project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter I62

On Sat, Jun 3, 2017 at 1:52 PM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

**Name** Ebrahim sadeghinia

**Address** 5290 Remington Road San Diego, Ca. 02115

**Comments** This project has tremendous negative impact to the way of living of our small community and is totally unacceptable. I have already submitted an answer to Ms. Laura Shinn. As I remember it, their EIR says something like this " no impact in AGRICULTURE or INDUSTRIAL". Genius people?

How about the traffic? in current situation we have several red lights in less than one mile ( from Montezoma Ave to my home), this is against the the traffic regulation of the city, because this is main street .

how about the noise that will disturb our right to live in peace in our homes?

how about depreciation of value of our homes? and much more.

I62-1

I62-2

I62-3

I62-4

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

## Responses to Comments – Individuals

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Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I62-5

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I62-6

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I62-7

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I62-8

## Responses to Comments – Individuals

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2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I62-9

3. Environmental Justice dictates that the DEIR's Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I62-10

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I62-11

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and

I62-12

reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I62-12  
Cont.

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing; or otherwise are considered sensitive." SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I62-13

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I62-14

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSU's construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption.

I62-15

## Responses to Comments – Individuals

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9. SDSU's analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU's Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday, SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the "fan shape" of the proposed Phase III construction. SDSU's models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU's maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I62-16

10. SDSU's significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I62-17

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

I62-18

Sincerely,

// Name at top of document is submitters name

## Responses to Comments – Individuals

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FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

## Response to Comment Letter I62

Ebrahim Sadeghinia

June 3, 2017

- I62-1** The comment is acknowledged and appreciated. The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I62-2** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The Project's impacts relative to traffic were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I62-3** The comment addresses generally the subject of noise related impacts, which received extensive analysis in the ~~draft environmental documentation~~ EIR. The noise analysis for the Project is contained in Section 4.11, Noise, of the Draft EIR. As shown in Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. With regards to potential noise effects from Phase III, any such effects are no longer a concern because the proposed project has been modified and SDSU no longer plans to pursue the development of Phase III. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the ~~p~~Proposed Project.
- I62-4** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I62-5** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall "since at least 2010." The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site. Accordingly, the correct reference year is 2013; LandLab has informed SDSU that the error has been corrected. As to the comment that the New Student Housing Project should have been included as a cumulative project in EIRs prepared since 2013, the Project was in the

conceptual planning stages for several years and it is incorrect to describe it as “reasonably foreseeable” during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I62-6** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk



## Responses to Comments – Individuals

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or exposure to wildfire to persons utilizing the Project's new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I62-7** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I62-8** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I62-9** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I62-10** The comment is critical of the Project's goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.

**I62-11** The California State University Board of Trustees' prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007

## Responses to Comments – Individuals

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Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.

**I62-12** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.

**I62-13** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I62-14** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I62-15** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which

requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

- I62-16** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,” and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on

## Responses to Comments – Individuals

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April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

### Ambient Noise Measurements Comparison

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I62-17** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

## Responses to Comments – Individuals

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- I62-18** The comment regarding President Hirshman’s May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed Project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project’s significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter I63

On Sat, Jun 3, 2017 at 7:55 PM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

**Name** Kelly Danielak

**Address** 6625 Alvarado Rd. Apt. 3512 San Diego, CA 92120

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I63-1

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I63-2

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I63-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I63-4

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I63-5

3. Environmental Justice dictates that the DEIR's Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any

I63-6



## Responses to Comments – Individuals

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area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires “a distinct west campus housing neighborhood similar to ... the east side of campus” (eliminates/diminishes east campus solutions) and Objective 2 requires “alleviate isolation of Chapultepec” and Objective 6 requires exploitation of “an existing undeveloped area”. When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I63-6  
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I63-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I63-8

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, “San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing; or otherwise are considered sensitive.” SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I63-9

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I63-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSU’s construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

I63-11

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I63-12

10. SDSU’s significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be

I63-13

## Responses to Comments – Individuals

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accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I63-13  
Cont.

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

I63-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

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## **Response to Comment Letter I63**

**Kelly Danielak**

**June 3, 2017**

**I63-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

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## Responses to Comments – Individuals

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The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I63-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the Project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.



**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I63-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I63-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed Project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter I64

On Sat, Jun 3, 2017 at 7:58 PM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

<b>Name</b>	Brian
<b>Address</b>	1032 first ave
<b>Phone number</b>	<a href="tel:707-337-7853">707-337-7853</a>

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[L.Shinn@mail.sdsu.edu](mailto:L.Shinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I64-1

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts

I64-2

that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I64-2  
Cont.

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I64-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I64-4

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I64-5

## Responses to Comments – Individuals

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3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I64-6

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I64-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I64-8

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or

I64-9

candidates for listing, or otherwise are considered sensitive.” SDSUs brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

↑ I64-9  
Cont.

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I64-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSUs construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

I64-11

9. SDSUs analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSUs Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I64-12

## Responses to Comments – Individuals

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10. SDSU's significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breathe the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I64-13

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

I64-14

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// Name at top of document is submitters name

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INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
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**Response to Comment Letter I64**

**Brian  
June 3, 2017**

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As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
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R2	49.7	48.1
R3	65.9	61.2
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As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I64-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I64-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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### Comment Letter I65

On Sat, Jun 3, 2017 at 9:30 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

#### Untitled Section

<b>Name</b>	Ken Horsley
<b>Address</b>	4844 Louise Dr., San Diego, CA 92115

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[L.Shinn@mail.sdsu.edu](mailto:L.Shinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I65-1

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts

I65-2

that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

↑ I65-2  
Cont.

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I65-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

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I65-5



3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I65-6

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I65-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I65-8

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or

I65-9

## Responses to Comments – Individuals

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candidates for listing, or otherwise are considered sensitive.” SDSUs brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I65-9  
Cont.

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I65-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSUs construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

I65-11

9. SDSUs analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSUs Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I65-12

## Responses to Comments – Individuals

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10. SDSU's significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breathe the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I65-13

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

I65-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

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## **Response to Comment Letter I65**

**Ken Horsley**

**June 3, 2017**

**I65-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I65-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I65-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I65-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I65-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I65-6** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I65-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I65-8** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I65-9** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I65-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I65-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I65-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

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## Responses to Comments – Individuals

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### Comment Letter I66

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Letter from the concerned residents of the College Area.

**Name** Kyra Moeller

**Address** 114 Arrowsmith Dr

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

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I66-2

## Responses to Comments – Individuals

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I66-3

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I66-6

## Responses to Comments – Individuals

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I66-6  
Cont.

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I66-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I66-8

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, “San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare, proposed or candidates for listing, or otherwise are considered sensitive.” SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I66-9

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I66-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSU’s construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

I66-11

9. SDSU’s analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU’s Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSU’s models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU’s maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I66-12

10. SDSU’s significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be

I66-13

## Responses to Comments – Individuals

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accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I66-13  
Cont.

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

I66-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

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TO ALL CSU TRUSTEES AND ALTERNATES

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## **Response to Comment Letter I66**

**Kyra Moeller**

**June 3, 2017**

**I66-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I66-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I66-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I66-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I66-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I66-6** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I66-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I66-8** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I66-9** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I66-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I66-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I66-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise

effects from the “constructive interference of the proposed Phase III building design,” and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the Project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I66-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I66-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter I67

On Sun, Jun 4, 2017 at 4:25 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

**Name** Claire Jorgensen

**Address** 5049 Yerba Anita Way, San Diego, CA, 92115

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I67-1

SDSUs DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I67-2

## Responses to Comments – Individuals

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The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I67-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I67-4

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I67-5

3. Environmental Justice dictates that the DEIR's Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any

I67-6



## Responses to Comments – Individuals

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area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires “a distinct west campus housing neighborhood similar to ... the east side of campus” (eliminates/diminishes east campus solutions) and Objective 2 requires “alleviate isolation of Chapultepec” and Objective 6 requires exploitation of “an existing undeveloped area”. When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I67-6  
Cont.

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I67-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I67-8

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I67-10

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I67-12

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I67-13

## Responses to Comments – Individuals

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I67-13  
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I67-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

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TO ALL CSU TRUSTEES AND ALTERNATES

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## **Response to Comment Letter I67**

**Claire Jorgensen**

**June 4, 2017**

**I67-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

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## Responses to Comments – Individuals

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As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.



**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
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**I67-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

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## Responses to Comments – Individuals

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### Comment Letter I68

On Sun, Jun 4, 2017 at 6:05 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

<b>Name</b>	Paige
<b>Address</b>	1803 Holly Hill Drive

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I68-1

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

I68-2

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

I68-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I68-4

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I68-5

3. Environmental Justice dictates that the DEIR's Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any

I68-6

## Responses to Comments – Individuals

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area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires “a distinct west campus housing neighborhood similar to ... the east side of campus” (eliminates/diminishes east campus solutions) and Objective 2 requires “alleviate isolation of Chapultepec” and Objective 6 requires exploitation of “an existing undeveloped area”. When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I68-6  
Cont.

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I68-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I68-8

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, “San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing; or otherwise are considered sensitive.” SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

I68-9

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I68-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSU’s construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

I68-11

9. SDSU’s analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU’s Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSU’s models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU’s maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I68-12

10. SDSU’s significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be

I68-13

## Responses to Comments – Individuals

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accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I68-13  
Cont.

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

I68-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

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## **Response to Comment Letter I68**

**Paige  
June 4, 2017**

**I68-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I68-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I68-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I68-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
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## Responses to Comments – Individuals

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### Comment Letter I69

On Sun, Jun 4, 2017 at 6:45 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

**Name** Kevin Jorgensen

**Address** 5049 Yerba Anita Way, San Diego, CA 92115

**Phone number** [619.582.3736](tel:619.582.3736)

**Comments** The draft EIR is flawed and poorly developed, for the reasons given, and must be re-visited thoroughly prior to any decision being rendered on such an important, long-term incursion upon the ecology of Aztec Canyon and the adjacent community. SDSU must not pretend to provide a fair and impartial analysis while in fact doing neither in order to serve short sighted economic concerns that insult the intelligence of the local community members and threaten to irreversibly damage the good will of the community of which it must remain a part of.

I69-1

I69-2

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

## Responses to Comments – Individuals

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169-3

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

169-4

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

169-5

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

169-6



2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I69-7

3. Environmental Justice dictates that the DEIR's Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I69-8

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I69-9

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and

I69-10

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↑  
I69-10  
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I69-11

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I69-12

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSU's construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption.

I69-13

## Responses to Comments – Individuals

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169-14

10. SDSU's significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

169-15

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

169-16

Sincerely,

// Name at top of document is submitters name

## Responses to Comments – Individuals

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FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

## **Response to Comment Letter I69**

**Kevin Jorgensen**

**June 4, 2017**

- I69-1** The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I69-2** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.
- I69-3** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also

## Responses to Comments – Individuals

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see the Biological Resources Thematic Response for additional information responsive to the comment.

- I69-4** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I69-5** The comment is an introduction to comments that follow. No further response is required.
- I69-6** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I69-7** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I69-8** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.

## Responses to Comments – Individuals

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- I69-9** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I69-10** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I69-11** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.
- I69-12** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I69-13** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions

from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I69-14** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,” and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.



## Responses to Comments – Individuals

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

- I69-15** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no

## Responses to Comments – Individuals

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more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

- I69-16** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

## Responses to Comments – Individuals

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### Comment Letter 170

On Sun, Jun 4, 2017 at 10:23 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

**Name** Olga Piro

**Address** 5457 Redding Road, San Diego, CA 92115

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

170-1

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170-2

## Responses to Comments – Individuals

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170-3

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170-6

## Responses to Comments – Individuals

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170-6  
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170-13

## Responses to Comments – Individuals

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I70-13  
Cont.

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

↑  
I70-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

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**Response to Comment Letter I70**

**Olga Piro  
June 4, 2017**

**I70-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I70-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I70-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I70-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I70-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I70-6** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I70-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
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- I70-9** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I70-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I70-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I70-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I70-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I70-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter I71

On Sun, Jun 4, 2017 at 9:53 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

**Name** Joan Anderson

**Address** 5422 Drover Drive

**Phone number** [619 583 3643](tel:619-583-3643)

**Comments** There are alternative sites that would not damage a wild canyon and cause the disastrous traffic problems embodied in the current proposal.

I71-1

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I71-2

## Responses to Comments – Individuals

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SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

171-3

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

171-4

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

171-5

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as

171-6



objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

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I71-6  
Cont.

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to . . . the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

I71-7

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I71-8

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I71-9

## Responses to Comments – Individuals

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6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or candidates for listing, or otherwise are considered sensitive." SDSU's brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

171-10

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

171-11

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming "unusual amounts" of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above "unusual." SDSU's construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California's leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption.

171-12

9. SDSU's analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU's Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and

171-13

## Responses to Comments – Individuals

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constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I71-13  
Cont.

10. SDSUs significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community’s cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breath the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSUs traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

I71-14

11. SDSUs President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman’s statement from May 8, 2017 follows: “In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns.”

I71-15

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

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TO ALL CSU TRUSTEES AND ALTERNATES

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## **Response to Comment Letter I71**

**Joan Anderson**

**June 4, 2017**

**I71-1** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I71-2** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall "since at least 2010." The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

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## Responses to Comments – Individuals

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## Responses to Comments – Individuals

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- I71-8** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
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from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I71-13** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,” and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.



## Responses to Comments – Individuals

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

- I71-14** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no

## Responses to Comments – Individuals

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more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

- I71-15** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

## Responses to Comments – Individuals

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### Comment Letter I72

On Sat, Jun 3, 2017 at 4:23 PM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

<b>Name</b>	Barbara Aguado
<b>Address</b>	5433 Redding Rd.
<b>Phone number</b>	<a href="tel:619-286-4586">619-286-4586</a>

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

I72-1

SDSU's DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts

I72-2

that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

↑ 172-2  
Cont.

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

↑ 172-3

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

↑ 172-4

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU's Sophomore Success Program. SDSU's west campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

↑ 172-5

## Responses to Comments – Individuals

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3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

172-6

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

172-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

172-8

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or

172-9

candidates for listing, or otherwise are considered sensitive.” SDSUs brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

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I72-9  
Cont.

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I72-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSUs construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

I72-11

9. SDSUs analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSUs Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I72-12

## Responses to Comments – Individuals

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10. SDSU's significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breathe the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

172-13

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

172-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

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## **Response to Comment Letter I72**

**Barbara Aguado**

**June 3, 2017**

**I72-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I72-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I72-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I72-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I72-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I72-6** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I72-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I72-8** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I72-9** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I72-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I72-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I72-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

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<b>Receiver</b>	<b>January 16 2017 Noise Measurement Data <math>L_{eq}</math> (dBA)</b>	<b>April 27 2017 Noise Measurement Data <math>L_{eq}</math> (dBA)</b>
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**I72-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter 173

On Sat, Jun 3, 2017 at 5:41 PM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

**Name** Jason Cook

**Address** 4972 College Gardens Court San Diego CA 92115

**Phone number** [6192851494](tel:6192851494)

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

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173-1

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173-2

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↑ 173-2  
Cont.

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

↑ 173-3

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↑ 173-5



3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

173-6

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

173-7

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

173-8

6. SDSU's biological survey of Aztec Canyon was limited and incomplete and the DEIR fails to identify all of the impacts from the proposed project. Aztec Canyon is known habitat for gnatcatchers, red tailed hawks and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of Aztec Canyon. Further, according to the City of San Diego, "San Diego County contains over 200 plant and animal species that are federally and/or state listed as endangered, threatened, or rare; proposed or

173-9

candidates for listing, or otherwise are considered sensitive.” SDSUs brief survey was insufficient and fails to identify the known species that whether or not discovered in this particular limited time study are likely to continue to inhabit Aztec Canyon.

↑ I73-9  
Cont.

7. SDSU must conclude that any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on brownfield, disturbed, or redevelopment sites can be less than significant, depending on the specific situation and unbiased environmental analysis. Since SDSU has by its own choice excluded many suitable brownfield, disturbed and redevelopment sites from consideration (e.g., the Campus Plan approved Maya/Olmeca redevelopment), SDSU CANNOT assert that any destructive use of Aztec Canyon is outweighed by any benefits. SDSU must demonstrate active consideration of all brownfield, disturbed, redevelopment, and potential acquisition/condemnation prior to resorting to the environmentally destructive, non-mitigatable, significant and irreversible destruction of any portion of Aztec Canyon.

I73-10

8. SDSU must conclude that non-renewable energy use associated with project development and building operation is significant and must be mitigated. SDSU gives itself a free pass for not consuming “unusual amounts” of energy during construction and building operation. California has passed AB 32, SB 32, SB 350 and a host of other emissions and energy related legislation that sets energy consumption and emissions requirements substantially above “unusual.” SDSUs construction must use the highest mix possible of renewable natural gas, biomethane, and biodiesel in all construction equipment to mitigate both localized criteria pollution and to be consistent with California’s leadership in carbon reduction. Since the buildings are 50-year assets and will exist past the 2030 and 2050 California emissions goals, all construction must demonstrate that it can be successfully operated with at least 40% carbon emissions reductions by 2030 and at least 80% carbon emissions reductions by 2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

I73-11

9. SDSUs analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSUs Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the “fan shape” of the proposed Phase III construction. SDSUs models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSUs maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

I73-112

## Responses to Comments – Individuals

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10. SDSU's significant traffic impacts are unacceptable and must be fully mitigated or the project must be revised until traffic impacts are less than significant. In another demonstration of self-serving bias, SDSU concludes that the project has unavoidable, significant impacts that must be accepted by the community because SDSU so declares that its project is more important than the community's cumulative rights and interests. Further, the traffic analysis fails to adequately characterize the increase in green house gasses and criteria pollution from the significant impacts, thus failing to monetize the health impacts of surrounding residents who will breathe the emissions from increased, slower moving traffic and the impacts on state of California green house gas targets. SDSU's traffic study must be rejected and all significant impacts mitigated or the project modified to remove significant impacts.

173-13

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

173-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: [LShim@mail.sdsu.edu](mailto:LShim@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES

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## **Response to Comment Letter I73**

**Jason Cook**

**June 3, 2017**

**I73-1** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project’s Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

**I73-2** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I73-3** The comment is an introduction to comments that follow. No further response is required.

## Responses to Comments – Individuals

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- I73-4** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I73-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I73-6** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.
- I73-7** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I73-8** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I73-9** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

**I73-10** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I73-11** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the Project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I73-12** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,”

and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.



**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

**I73-13** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I73-14** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.

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## Responses to Comments – Individuals

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### Comment Letter A1

On Sun, Jun 4, 2017 at 10:58 AM, Save Aztec Canyon <[residents.college.area@gmail.com](mailto:residents.college.area@gmail.com)> wrote:  
Letter from the concerned residents of the College Area.

**Name** Rene Kaprielian

**Address** 5270 Remington Rd. San Diego

**Phone number** [619 315-5900](tel:6193155900)

**Comments** SDSU should be leveraging the trolley and transit center and placing high density housing around the inner core of the campus. Why place 14 story high-rise dorms a half mile away from transit in an environmentally sensitive canyon on a two lane residential street abutting a single homes? Where is the environmental vision? SDSU needs to take a class on environmental planning.

174-1

Laura Shinn  
Director, Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California  
92182-1624  
[LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu)

SUBJECT: Formal Comments for SDSU DEIR (4/21/17)

## Responses to Comments – Individuals

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Since at least 2010, SDSU has had plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter “Aztec Canyon”) directly west of Chapultepec Hall. SDSU withheld this piecemealed project from the public until December 2016, and failed to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

174-2

SDSU’s DEIR is insufficient and fails to identify all significant effects, alternatives, and potential mitigation measures associated with the project. As a direct result of the insufficiency of the DEIR, SDSU proposes to approve their project that includes significant environmental impacts that have feasible alternatives that can and must be implemented under CEQA to reduce or remove damages to the environment.

174-3

The following comments highlight some of the insufficiencies of the DEIR that must be considered if SDSU is to continue with this, or any related student housing project and be compliant with the letter and spirit of CEQA:

174-4

1. SDSU must delay its aggressive project construction start date in order to reduce or remove environmental damages. SDSU wants to break ground in the fall of 2017 according to its public meetings, yet SDSU did not even begin public engagement until December of 2016 on a plan that it developed beginning in 2010 and updated in 2013. In order to maintain the crisis schedule of SDSU’s own making, it has eliminated environmentally preferable siting choices and mechanisms that responsible agencies utilize to minimize environmental impacts. Those environmentally-damaging constraints that SDSU has placed on the project through its Goals and Objectives include: 1) required use of only SDSU-owned land (SDSU can condemn and reuse sites); 2) prohibition on demolition/rebuild of existing SDSU sites (2007 Campus Master Plan approved demo/rebuild of Maya/Olmeca Halls for 1600 beds) and 3) required use of undeveloped land (often a death blow to any EIR to require greenfield construction). As a direct result of expedited schedule and removal of valid options, SDSU’s DEIR asks to certify significant, non-mitigatable and irreversible impacts that could have been easily avoided through ordinary, environmentally responsible planning and ample public input. SDSU alone chose to withhold this project until the 11th hour and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU created its own timing crisis, and CEQA does not allow SDSU to give the environment short shrift to correct its own timing error. If SDSU wanted to build a 2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

174-5

2. SDSU must conduct an unbiased environmental analysis to support the proposed project as an environmentally preferred solution for SDSU’s Sophomore Success Program. SDSU’s west

174-6

campus housing project as proposed in the DEIR has been in various stages of design since 2010, well before SDSU's Sophomore Success Program mandated live-on requirements for non-exempt sophomores. The project has been a desired "solution" of SDSU that has been "in search of a problem." SDSU has biased the DEIR toward selection of this specific project and the entire DEIR must be examined to comprehensively remove all biases in objectives, scoring, methodology, analyses, conclusions, and narrative. Public agencies are required to be as objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

174-6  
Cont.

3. Environmental Justice dictates that the DEIRs Project Goals and Objectives be rewritten in a least restrictive manner to support the Sophomore Success Program and not the elective redevelopment of the 30-year-old Chapultepec Hall local area. SDSU's website and Project Background both tout the Sophomore Success Program as the Purpose and Need for this housing development. However, the Project Goals and Objectives are written to effectively exclude any area other than Aztec Canyon and the existing parking lot. For example, Objective 1 requires "a distinct west campus housing neighborhood similar to ... the east side of campus" (eliminates/diminishes east campus solutions) and Objective 2 requires "alleviate isolation of Chapultepec" and Objective 6 requires exploitation of "an existing undeveloped area". When taken together in the selection process, the eight Project Goals contain some highly specific and site-eliminating factors that result in the destruction of Aztec Canyon and other non-mitigatable, irreversible significant impacts that can be mitigated through environmentally-responsible planning.

174-7

4. SDSU must consider previously approved housing projects from its most recent, 2007 Campus Master Plan and other campus plans and specifically include the demolition/rebuild of Maya/Olmeca Halls to meet Sophomore Success Program needs. SDSU proposed, and the CSU Trustees unanimously approved, a campus plan that included the demolition of the two lowest ranked campus dorms, Maya/Olmeca, and their replacement with two towers totaling 1,600 students. This already approved action would be environmentally superior to greenfield development in Aztec Canyon and would utilize disturbed, brownfield land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

174-8

5. SDSU must consider its own 2013 West Campus Master Plan that proposed 1,400 student beds in Lot U east of Chapultepec Hall and amend use of Lot U in the DEIR to accommodate 1,400 students. The proposed project squanders the disturbed, brownfield space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013 placed 1,400 students in the same space. The much more efficient use of a brownfield site is more environmentally responsible and reduces any other possible impacts by minimizing other needed sites. In public meetings, SDSU asserted that the proposed plan would be more pleasing to students. The allure of pleasing

174-9

## Responses to Comments – Individuals

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↑ 174-9  
Cont.

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174-10

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174-11

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174-12

## Responses to Comments – Individuals

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9. SDSU's analysis of noise impacts is inadequate, must be conducted de novo, and significant impacts remain and must be discontinued or mitigated. According to SDSU's Appendix J, it conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr. Holiday. SDSU was not in session. SDSU fails to measure the existing sound from student residences use appropriate engineering analysis to amplify them to reflect the location, and constructive interference of sound from the "fan shape" of the proposed Phase III construction. SDSU's models are inadequate and noise levels from the planned Phase III would create significant impacts to the surrounding community to the west. Further, SDSU's maintenance of stationary noise sources is inadequate, as witnessed by the many complaints regarding nighttime noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

174-13

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174-14

11. SDSU's President Elliot Hirshman also recognized the significant impacts of this project and that the proposed project is unacceptable due to non-mitigatable, irreversible significant impacts. President Hirshman's statement from May 8, 2017 follows: "In response to concerns expressed by the community and our local elected officials, I have directed our team to move forward with a project that does not include significant and unavoidable impacts. The development of Phase III and portions of Phase II would result in significant and unavoidable impacts. Over the next few months we will be modifying the project in response to these concerns."

174-15

Sincerely,

// Name at top of document is submitter's name

## Responses to Comments – Individuals

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FULL EMAIL LIST: [LShinn@mail.sdsu.edu](mailto:LShinn@mail.sdsu.edu), [TWhite@Calstate.edu](mailto:TWhite@Calstate.edu),  
[TrusteeSecretariat@CalState.edu](mailto:TrusteeSecretariat@CalState.edu), [Presidents.Office@sdsu.edu](mailto:Presidents.Office@sdsu.edu), [PresOffi@mail.sdsu.edu](mailto:PresOffi@mail.sdsu.edu),  
[mcollins@mail.sdsu.edu](mailto:mcollins@mail.sdsu.edu)

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE  
TO ALL CSU TRUSTEES AND ALTERNATES



## **Response to Comment Letter I74**

**Rene Kaprielian**

**June 4, 2017**

**I74-1** With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations for Phases II and III. However, following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

**I74-2** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall "since at least 2010." The reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Specifically, one of the images from a 2013 Carrier Johnson study prepared for SDSU was incorrectly labeled as 2010 when posted on a LandLab web site; LandLab was a sub-consultant to Carrier Johnson. Carrier Johnson was not retained by SDSU as a consultant until March 2013. Accordingly, the correct reference year is 2013, and LandLab has informed SDSU that the web site error has been corrected. As to the comment that the New Student Housing project should have been included as a cumulative project in EIRs prepared since 2013, the present EIR is the first EIR prepared by SDSU since the 2011 Plaza Linda Verde EIR and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it is incorrect to describe it as a probable future project during this period.

As to the comment regarding biology and fire hazards, as identified in the Project's Fire Fuel Load Modeling Report, the Project site is within an area designated by the San Diego Fire Department as a very high fire hazard severity zone (VHFHSZ). This hazard rating is based on terrain, fuels, and fire environment. Large portions of San Diego County and the City of San Diego are within fire hazard severity zones. These zones were delineated so that minimum fire resistant construction and landscape standards would be required for all new construction. The Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Project complies with the requirements for building in VHFHSZs, and has been determined to not increase risk or exposure to wildfire to persons utilizing the Project's new buildings. Please also

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see the Biological Resources Thematic Response for additional information responsive to the comment.

**I74-3** The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I74-4** The comment is an introduction to comments that follow. No further response is required.

**I74-5** The comment claims SDSU must delay the construction start date of the New Student Housing project “in order to remove environmental damages.” The schedule put forth by SDSU for the New Student Housing project fully complies with all legal requirements, including those of the California Environmental Quality Act. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, please see the Alternatives Thematic Response for information responsive to the comment. As to the comment regarding “non-mitigable and irreversible impacts,” following distribution of the Draft EIR and the close of the public comment period, the proposed Project was modified in response to public comments to eliminate Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the environmental impacts related to the siting of Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. The remainder of the comment largely expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.

**I74-6** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

**I74-7** The comment is critical of the Project’s goals and objectives; however, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for additional information responsive to the comment.

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- I74-8** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. As to the demolition/rebuild of Maya/Olmeca Halls, please see the Alternatives Thematic Response for additional information responsive to the comment.
- I74-9** The comment suggests development of facilities to house 1,400 student beds in Lot U east of Chapultepec Hall. Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I74-10** The comment regard the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.
- I74-11** The comment is incorrect in asserting that “any destruction of Aztec Canyon while brownfield or redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment.” The Draft EIR, Section 4.3, Biological Resources, includes a comprehensive analysis, prepared by expert biologists, of the potential environmental impacts of the proposed project on biological resources, including specifically the referenced canyon. The analysis determined that all potential environmental impacts would be mitigated to less than significant. In addition, since release of the Draft EIR, the Project has been modified to remove Phases II and III, ensuring no direct impacts to biological resources in the canyon. The remainder of the comment expresses the opinions of the commentator and will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I74-12** The comment claims that the non-renewable energy use associated with project development and operation is significant and must be mitigated. As shown in Section 4.5 and Appendix F of the Draft EIR, the energy use expected from project construction and operation does not pose a significant increase from historical local use. Also, energy usage from the Project is within the growth projections from regulatory agencies (CPUC and DOT). The regulations listed in the comment do not directly apply to the project. The state will create mandates based on these regulations, which will then apply to the California State University and then SDSU, which may be incorporated into future projects. The Project is in compliance with all applicable regulations at the time of this writing.

The comment also claims that SDSU must use renewable fuels during construction to mitigate pollution and be consistent with California’s carbon reduction. As shown in Sections 4.5, 4.7, and Appendix C and F of the Draft EIR, the Project would not result in a significant impact under CEQA. The estimated amortized GHG emissions

from construction represent less than 1 percent of the project’s operational inventory. Also, the Project was shown to be consistent with the local climate action plan which requires project features to reduce GHGs. The Project also does not use “unusual levels” of energy. The carbon reductions cited in the comment refer to those outlined in the State’s Scoping Plan which is not directly applicable to development projects. The Project was shown to be consistent with the measures and goals of the Scoping Plan in Section 4.7.6.

**I74-13** The comment states that the noise impacts analysis is inadequate and must be re-conducted because ambient noise measurements were conducted on the Martin Luther King, Jr. holiday. The comment also states that the noise analysis failed to measure the existing sound from student residences, that the analysis does not address noise effects from the “constructive interference of the proposed Phase III building design,” and that existing stationary noise sources (specifically an air handling unit at Peterson Gym) are not well-maintained and that this is causing nuisance noise.

As discussed in Draft EIR Section 4.11, Noise, ambient noise measurements were conducted on Monday, January 16, 2017, which was Martin Luther King Day; classes were not in session on this day. Ambient noise measurements for environmental studies like the SDSU EIR are conducted to characterize the ambient noise environment on and around the project site, and, in those circumstances when traffic noise dominates the ambient noise environment, to calibrate or verify the accuracy of the traffic noise model.

In this instance, there was substantial influence from noise sources other than traffic, such as noise from students on the adjacent athletic fields (although a holiday, students were on campus and active), mechanical noise from HVAC systems, and noise from landscape equipment. Thus, because traffic noise was not the dominant noise source at this location, the noise measurements were *not* used to calibrate the accuracy of the traffic noise model. As such, the ambient noise data measured on January 16, 2017 has no bearing on the traffic noise impacts analysis or results. Instead, the analysis of traffic noise impacts used traffic data provided by LLG, the traffic engineers for the project, and, therefore, the analysis of traffic noise is unrelated to the ambient noise levels measured.

Although the noise measurements conducted on January 16 accurately represent typical noise conditions, in an abundance of caution, noise measurements were conducted again, on Thursday April 27, 2017 at the same measurement locations. The noise measurement results, including traffic counts where collected, are included in Appendix N-1 of the Final EIR. On this day, classes were in session.

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As shown below, the measurement results taken on April 27 were generally similar to those taken on January 16. In fact, as shown on the table, at receivers R1, R2, R4 and R5, the measured ambient noise levels were actually 1 to 2 decibels *lower* on April 27 than January 16. At receiver R3, the measured ambient noise level was approximately 5 decibels *lower* than measured previously; this is mainly attributable to the fact that on January 16, there was a large amount of activity on the baseball field to the south, whereas on April 27, there was not. It is also worth noting that the traffic counts taken on April 27 are similar to those taken on January 16. Therefore, the fact that both the noise measurements and traffic volumes were similar under both holiday and non-holiday conditions shows that the results of the ambient noise measurements taken on January 16 did not adversely affect the noise impacts analysis or the impacts conclusions.

**Ambient Noise Measurements Comparison**

Receiver	January 16 2017 Noise Measurement Data $L_{eq}$ (dBA)	April 27 2017 Noise Measurement Data $L_{eq}$ (dBA)
R1	49.9	47.6
R2	49.7	48.1
R3	65.9	61.2
R4	50.9	52.2
R5	61.2	58.9

As shown in Draft EIR Section 4.11.3.1, Existing Environmental Setting, noise measurement location R3 is on the premises of Chapultepec Hall, thus existing sound from student residences was measured. On-site noise from stationary mechanical equipment is a code enforcement issue subject to the San Diego municipal code noise standards. These standards are enforceable by the City of San Diego Police Department and the SDSU Police; SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. With regards to potential noise effects from Phase III, the comment is no longer applicable because, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

- I74-14** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the proposed project has been modified to eliminate the development of both Phases II and III. As to the comments regarding greenhouse gases and criteria pollution, Draft EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, include analysis of the impacts associated with the Project's vehicular emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no

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more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project.

- I74-15** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, and comments submitted on the Draft EIR, the proposed Project has been modified to eliminate Phases II and III in their entirety such that the proposed Project will no longer have significant unavoidable impacts, and all of the Project's significant environmental impacts will be reduced to less than significant.