

Responses to Comments – Individuals

Comment Letter 175

On Sun, Jun 4, 2017 at 11:27 AM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name Gary Ellenor

Address 5116 Remington Rd

Phone number [619-743-9111](tel:619-743-9111)

Comments

I have lived in the College View Estates area for 17 years and it is the best neighborhood I have ever resided in. Until now there has been good cooperation with SDSU. After attending several meetings on this project, the recent slam dunk of constructing these dormitories reveals a university staff that show little concern for their neighbors. Not only has the process vetting process been crude but it's clear that the people working on this project can no longer see the forest amongst the trees. SDSU needs some new blood on this project to re-look at all the other potential sites that can accomodate this project and not have the significant impact on wild life and this community. Please, use your brains! You are a leading learning center!

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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

Responses to Comments – Individuals

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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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.

175-5

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:

175-6

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.

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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.

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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.

175-9

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.

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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 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.

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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.

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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.

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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.

175-15

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.

175-16

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.”

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Sincerely,

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// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
mcollins@mail.sdsu.edu

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

Response to Comment Letter I75

Gary Ellenor

June 4, 2017

- I75-1** The comment is an introduction to comments that follow. No further response is required.
- I75-2** 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.
- I75-3** 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.
- I75-4** 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 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

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- 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.
- I75-5** 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.
- I75-6** The comment is an introduction to comments that follow. No further response is required.
- I75-7** 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 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.
- I75-8** 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.

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- I75-9** 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.
- I75-10** 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.
- I75-11** 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.
- I75-12** 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.
- I75-13** 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.
- I75-14** 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.

I75-15 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

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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 Phases II and 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.

- I75-16** The significant and unavoidable traffic impacts referenced in the comment would have occurred with implementation of Phase III. However, as noted above, the

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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.

- I75-17** 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 176

From: **Save Aztec Canyon** <residents.college.area@gmail.com>
Date: Sun, Jun 4, 2017 at 12:48 PM
Subject: Thank you for helping save Aztec Canyon
To: mnelson@gmail.com, residents.college.area@gmail.com, LShinn@mail.sdsu.edu, TWhite@calstate.edu, TrusteeSecretariat@calstate.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu, mcollins@mail.sdsu.edu

Letter from the concerned residents of the College Area.

Name Diane

Address 12 ave

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

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176-11

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

176-12
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Responses to Comments – Individuals

noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

↑ I76-12
| 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.

| I76-13

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."

| I76-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I76

**Diane
June 4, 2017**

I76-1 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.

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I76-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I76-4** 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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- I76-7** 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.
- I76-8** 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.
- I76-9** 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.

I76-10 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.

I76-12 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 Phases II and 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.

I76-13 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.

I76-14 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 177

On Sun, Jun 4, 2017 at 2:23 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name	Kyle Joyce
Address	4219 Beach dr sw
Phone number	2062513328
Comments	Kyle Joyce

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

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.

177-1

Responses to Comments – Individuals

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.

177-2

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:

177-3

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.

177-4

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

177-5

objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

↑ I77-5
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.

I77-6

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.

I77-7

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.

I77-8

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 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.

177-9

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.

177-10

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.

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177-12

Responses to Comments – Individuals

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I77-12
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I77-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
mcollins@mail.sdsu.edu

INSTRUCTIONS TO SECRETARIAT OF THE CSU TRUSTEES – PLEASE DISTRIBUTE
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Response to Comment Letter I77

Kyle Joyce

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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 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)
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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.

I77-13 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.

I77-14 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 178

On Sun, Jun 4, 2017 at 4:01 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name	Ray and Roberta Thiesen
Address	5409 Hewlett Dr
Phone number	530 965 1897
Comments	Pristine canyon land should not be disturbed when there are other locations that can be used for dormitories.

178-1

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

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.

178-2

Responses to Comments – Individuals

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.

178-3

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:

178-4

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.

178-5

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

178-6

objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

↑ 178-6
↑ 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.

178-7

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.

178-8

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.

178-9

Responses to Comments – Individuals

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.

178-10

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.

178-11

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.

178-12

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

178-13

Responses to Comments – Individuals

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.

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178-13
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.

178-14

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.”

178-15

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I78

Ray and Roberta Thiesen

June 4, 2017

I78-1 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.

I78-2 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

Responses to Comments – Individuals

see the Biological Resources Thematic Response for additional information responsive to the comment.

I78-3 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.

I78-4 The comment is an introduction to comments that follow. No further response is required.

I78-5 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.

I78-6 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.

I78-7 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.

Responses to Comments – Individuals

- I78-8** 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.
- I78-9** 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.
- I78-10** 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.
- I78-11** 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.
- I78-12** 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.

I78-13 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.

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Responses to Comments – Individuals

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Responses to Comments – Individuals

Comment Letter 179

On Sun, Jun 4, 2017 at 4:33 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:

Letter from the concerned residents of the College Area.

Name	Abigail Horner
Address	5 Chelsea Drive, Bow, NH 03304
Phone number	603-491-7453

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

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179-1

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179-2

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179-2
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179-5

Responses to Comments – Individuals

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179-6

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.

179-7

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.

179-8

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

179-9

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.

↑ 179-9
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.

179-10

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.

179-11

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.

179-12

Responses to Comments – Individuals

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.

179-13

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."

179-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I79

Abigail Horner

June 4, 2017

I79-1 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. 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 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 Proposed 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.

I79-2 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.

I79-3 The comment is an introduction to comments that follow. No further response is required.

I79-4 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

Responses to Comments – Individuals

- 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.
- I79-5** 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.
- I79-6** 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.
- I79-7** 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.
- I79-8** 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.
- I79-9** 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.

I79-10 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.

I79-11 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 Section 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.

I79-12 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.

I79-13 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.

I79-14 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 180

On Sun, Jun 4, 2017 at 8:53 AM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:

Letter from the concerned residents of the College Area.

Name Cynthia Gilbertson

Address 5541 Drover Drive, San Diego, CA 92115

Comments

SDSU needs to be a good neighbor! When the houses were built in the late 50's, it was not a problem for SDSU, now they want to get to rid of us. I'm sure that SDSU could have purchased the property back then, but did not foresee the attraction it would have in the future. My parents bought the house, that I now live in in 1966, they were the second owners. I can remember all of the single family homes on Hardy and Lindo Paseo, the brick dorms that were at the end of Remington, just before you go into CVE, times have changed. PLEASE think how you would like almost 3,000 students in your backyard, and not to take into account the old mighty dollar, PLEASE, reconsider your options and be thoughtful to the neighbors, no matter where you decide to build. SDSU is a great University and San Diegans want to see it prosper, but not to the extent that you drive us out.

180-1

180-2

180-3

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

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

Responses to Comments – Individuals

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.

180-4

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.

180-5

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:

180-6

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.

180-7

Responses to Comments – Individuals

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.

180-8

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.

180-9

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.

180-10

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

180-11

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.

↑
180-11
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.

180-12

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.

180-13

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.

180-14

Responses to Comments – Individuals

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.

180-15

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180-16

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."

180-17

Sincerely,

// Name at top of document is submitters name

Responses to Comments – Individuals

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
mcollins@mail.sdsu.edu

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

Response to Comment Letter I80

Cynthia Gilbertson

June 4, 2017

- I80-1** 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.
- I80-2** 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.
- I80-3** 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.
- I80-4** 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 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

Responses to Comments – Individuals

- 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.
- I80-5** 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.
- I80-6** The comment is an introduction to comments that follow. No further response is required.
- I80-7** 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 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.
- I80-8** 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.

Responses to Comments – Individuals

- I80-9** 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.
- I80-10** 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.
- I80-11** 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.
- I80-12** 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.
- I80-13** 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.
- I80-14** 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.

- I80-15** 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

Responses to Comments – Individuals

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
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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.

- I80-16** 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

Responses to Comments – Individuals

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.

- I80-17** 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

Comment Letter I81

On Sun, Jun 4, 2017 at 4:40 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:

Letter from the concerned residents of the College Area.

Name John T. Armantrout

Address 5059 College Gardens Ct., San Diego, CA, 92115

Phone number [619-392-9787](tel:619-392-9787)

Comments Please stop this project!

I 181-1

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

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 181-2

Responses to Comments – Individuals

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.

181-3

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:

181-4

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.

181-5

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

181-6

Responses to Comments – Individuals

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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I81-6
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.

I81-7

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.

I81-8

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.

I81-9

Responses to Comments – Individuals

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.

181-10

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.

181-11

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.

181-12

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

181-13

Responses to Comments – Individuals

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.

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I81-13
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.

I81-14

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.”

I81-15

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I81

John T. Armantrout

June 4, 2017

I81-1 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.

I81-2 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.

I81-3 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.

Responses to Comments – Individuals

- I81-4** The comment is an introduction to comments that follow. No further response is required.
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- I81-9** 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.

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 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.
- I81-13** 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

Responses to Comments – Individuals

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.

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Responses to Comments – Individuals

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. **I81-14** 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.

I81-15 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.

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Comment Letter I82

From: **Save Aztec Canyon** <residents.college.area@gmail.com>
Date: Sun, Jun 4, 2017 at 5:04 PM
Subject: Thank you for helping save Aztec Canyon
To: mnelson@gmail.com, residents.college.area@gmail.com, LShinn@mail.sdsu.edu, TWhite@calstate.edu, TrusteeSecretariat@calstate.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu, mcollins@mail.sdsu.edu

Letter from the concerned residents of the College Area.

Name	kimiya banaj
Address	33 peach blossom irvine 92618

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

I82-1

Responses to Comments – Individuals

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.

182-2

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:

182-3

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.

182-4

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Responses to Comments – Individuals

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182-6

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.

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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.

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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,

182-9

Responses to Comments – Individuals

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.

182-9
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182-10

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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

182-12

Responses to Comments – Individuals

noise from what sounds to be a defective air handler on the roof of Petersen Gym, further leading to significant impacts.

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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.

I81-13

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."

I81-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I82

Kimiya Banaji

June 4, 2017

I82-1 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.

I82-2 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.

I82-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I82-4** 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.
- I82-5** 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.
- I82-6** 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.
- I82-7** 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.
- I82-8** 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.
- I82-9** 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.

I82-10 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.

I82-11 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.

I82-12 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.

I82-13 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.

I82-14 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 I83

On Sun, Jun 4, 2017 at 8:11 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name	Mary Fisher
Address	5452 Drover Dr, San Diego, Ca 92115
Phone number	619-294-8961

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

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I83

Mary Fisher

June 4, 2017

I83-1 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.

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Responses to Comments – Individuals

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Ambient Noise Measurements Comparison

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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.

I83-13 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.

I83-14 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 I84

On Sun, Jun 4, 2017 at 8:15 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name	Jill Cress
Address	17 Sandy Beach Rd, Vallejo, Ca 94590
Phone number	707-553-8334

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

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.

I84-1

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

I84-2

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

184-2
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:

184-3

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.

184-4

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.

184-5

Responses to Comments – Individuals

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.

184-6

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.

184-7

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.

184-8

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

184-9

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.

↑ 184-9
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.

184-10

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.

184-11

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.

184-12

Responses to Comments – Individuals

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.

184-13

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."

184-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I84

**Jill Cress
June 4, 2017**

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I84-14 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 I85

On Sun, Jun 4, 2017 at 8:37 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name Katie Cress

Address 5452 Drover 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
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.

I85-1

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.

I85-2

Responses to Comments – Individuals

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:

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185-6

Responses to Comments – Individuals

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185-6
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185-10

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185-12

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

185-13

Responses to Comments – Individuals

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.

↑
I85-13
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."

I85-14
↓

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I85

Katie Cress

June 4, 2017

I85-1 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 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.

I85-2 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.

I85-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I85-4** 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.
- I85-5** 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.
- I85-6** 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.
- I85-7** 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.
- I85-8** 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.
- I85-9** 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.

I85-10 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.

I85-11 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, the use 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.

I85-12 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.

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Responses to Comments – Individuals

Comment Letter I86

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Letter from the concerned residents of the College Area.

Name Mary Cress

Address 3446 29th Street, San Diego, Ca 92114

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

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Responses to Comments – Individuals

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Responses to Comments – Individuals

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186-12

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

186-13

Responses to Comments – Individuals

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.

↑
I86-13
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."

↑
I86-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I86

Mary Cress

June 4, 2017

I86-1 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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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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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..

I86-13 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.

I86-14 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 I87

From: **Save Aztec Canyon** <residents.college.area@gmail.com>
Date: Sun, Jun 4, 2017 at 8:38 PM
Subject: Thank you for helping save Aztec Canyon
To: mnelson@gmail.com, residents.college.area@gmail.com, LShinn@mail.sdsu.edu, TWhite@calstate.edu, TrusteeSecretariat@calstate.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu, mcollins@mail.sdsu.edu

Letter from the concerned residents of the College Area.

Name	Paul Cress
Address	1930 Hyde Street #8, San Francisco, Ca 94109

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

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187-1
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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.

187-2

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:

187-3

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.

187-4

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.

187-5

Responses to Comments – Individuals

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.

187-6

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.

187-7

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.

187-8

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,

187-9

Responses to Comments – Individuals

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.

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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.

187-10

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.

187-11

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Responses to Comments – Individuals

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I87-14

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// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
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mcollins@mail.sdsu.edu

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June 4, 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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Responses to Comments – Individuals

Comment Letter I88

On Sun, Jun 4, 2017 at 8:42 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name John Cress

Address 1933 Larkin St, San Francisco, Ca 94109

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

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I88-2

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:

188-3

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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188-6

Responses to Comments – Individuals

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.

188-6
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188-8

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.

188-9

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.

188-10

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.

188-11

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.

188-12

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

188-13

Responses to Comments – Individuals

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.

↑
I88-13
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."

I88-14
↓

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I88

John Cress

June 4, 2017

I88-1 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 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.

I88-2 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.

I88-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I88-4** 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.
- I88-5** 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.
- I88-6** 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.
- I88-7** 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.
- I88-8** 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.
- I88-9** 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.

I88-10 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.

I88-11 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.

I88-12 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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Responses to Comments – Individuals

Comment Letter I89

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Letter from the concerned residents of the College Area.

Name	KENT
Address	Fisher
Phone number	619-294-8974

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

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I89-2

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189-9

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.

↑ 189-9
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.

189-10

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.

189-11

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.

189-12

Responses to Comments – Individuals

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.

189-13

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."

189-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I89

Kent Fisher

June 4, 2017

I89-1 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 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.

I89-2 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.

I89-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I89-4** 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.
- I89-5** 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.
- I89-6** 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.
- I89-7** 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.
- I89-8** 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.
- I89-9** 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.

I89-10 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.

I89-11 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.

I89-12 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.

I89-13 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.

I89-14 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 190

On Sun, Jun 4, 2017 at 8:58 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name	Kent Fisher
Address	3446 29th, San Diego, Ca 92114

Laura Shinn
Director, Facilities Planning, Design, and Construction
San Diego State University
5500 Campanile Drive
San Diego, California
92182-1624
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 190-1

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.

I 190-2

Responses to Comments – Individuals

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:

190-3

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.

190-4

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.

190-5

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

190-6

Responses to Comments – Individuals

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.

190-6
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.

190-7

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.

190-8

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.

190-9

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.

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190-12

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Responses to Comments – Individuals

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I90-13
Cont.

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I90-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
mcollins@mail.sdsu.edu

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Response to Comment Letter I90

Kent Fisher

June 4, 2017

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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.

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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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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.

I90-13 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

Comment Letter I91

On Sun, Jun 4, 2017 at 10:14 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name	Riley Johnson
Address	5320 Hewlett Drive
Phone number	925-858-8454

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

I91-1

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

I91-2

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

I91-2
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:

I91-3

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.

I91-4

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.

I91-5

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.

191-6

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.

191-7

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.

191-8

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

191-9

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.

I91-9
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.

I91-10

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.

I91-11

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.

I91-12

Responses to Comments – Individuals

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.

I91-13

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."

I91-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I91

Riley Johnson

June 4, 2017

I91-1 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 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.

I91-2 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.

I91-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I91-4** 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.
- I91-5** 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.
- I91-6** 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.
- I91-7** 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.
- I91-8** 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.
- I91-9** 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.

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Responses to Comments – Individuals

Comment Letter I92

On Sun, Jun 4, 2017 at 10:45 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name	Esther Lightman
Address	5256 College Gardens Ct, San Diego, CA 92115
Phone number	858.609.9335
Comments	This project would be better suited for another site, closer to other dorms.

I 192-1

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

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

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I 192-2

Responses to Comments – Individuals

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192-3

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:

192-4

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192-6

Responses to Comments – Individuals

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↑ 192-6
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.

192-7

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.

192-8

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.

192-9

Responses to Comments – Individuals

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.

192-10

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192-11

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192-12

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192-13

Responses to Comments – Individuals

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I92-13
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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.

I92-14

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.”

I92-15

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
mcollins@mail.sdsu.edu

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TO ALL CSU TRUSTEES AND ALTERNATES

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Response to Comment Letter I92

Esther Lightman

June 4, 2017

I92-1 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.

I92-2 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

Responses to Comments – Individuals

see the Biological Resources Thematic Response for additional information responsive to the comment.

I92-3 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.

I92-4 The comment is an introduction to comments that follow. No further response is required.

I92-5 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.

I92-6 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.

I92-7 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.

Responses to Comments – Individuals

- I92-8** 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.
- I92-9** 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.
- I92-10** 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.
- I92-11** 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.
- I92-12** 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.

I92-13 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.

- I92-14** 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

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.

- I92-15** 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

Comment Letter I93

On Sun, Jun 4, 2017 at 10:48 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name	Dr. Mordecai Lightman
Address	5256 College Gardens Court, San Diego, CA 92115
Phone number	619.405.2696
Comments	This project would be better suited in an area near more dormitories.

I 193-1

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

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 193-2

Responses to Comments – Individuals

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.

193-3

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:

193-4

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.

193-5

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

193-6

objective and rigorous on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

↑ 193-6
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.

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Responses to Comments – Individuals

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Responses to Comments – Individuals

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I93-13
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I93-15

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I93

Dr. Mordecai Lightman

June 4, 2017

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Responses to Comments – Individuals

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Responses to Comments – Individuals

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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.

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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.

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)
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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.

- I93-14** 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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Responses to Comments – Individuals

Comment Letter I94

On Sun, Jun 4, 2017 at 10:51 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name	Maxwell Lightman
Address	5256 College Gardens Ct, San Diego, CA 92115
Comments	Don't destroy the canyon or the neighborhood! This project belongs near other, existing, more densely populated dorms.

I 194-1

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

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 194-2

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

I 194-3
↓

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.

↑ 194-3
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:

↑ 194-4

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. These 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.

↑ 194-5

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.

↑ 194-6

Responses to Comments – Individuals

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.

194-7

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.

194-8

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.

194-9

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

194-10

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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I94-10
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.

I94-11

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.

I94-12

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.

I94-13

Responses to Comments – Individuals

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.

I94-14

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."

I94-15

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I94

Maxwell Lightman

June 4, 2017

I94-1 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.

I94-2 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

Responses to Comments – Individuals

see the Biological Resources Thematic Response for additional information responsive to the comment.

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Responses to Comments – Individuals

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Responses to Comments – Individuals

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Responses to Comments – Individuals

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Responses to Comments – Individuals

Comment Letter I95

On Sun, Jun 4, 2017 at 11:10 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name Randi McKenzie

Address 5127 Walsh Way, San Diego, CA

Phone number [619-534-1732](tel:619-534-1732)

Comments Please consider placing additional university housing on the site of the existing 55st apartments as was done on the former single story apartments on Montezuma Road or at Qualcomm Stadium. Placing 10-14 storied residence halls near a community of single storied homes negatively impacts the quality of life for those residents.

I95-1

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

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

Responses to Comments – Individuals

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.

195-2

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.

195-3

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:

195-4

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.

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195-6

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I95-6
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I95-7

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.

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I95-9

Responses to Comments – Individuals

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↑
I95-9
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I95-11

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.

I95-12

Responses to Comments – Individuals

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I95-13

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.

I95-14

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.”

I95-15

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
mcollins@mail.sdsu.edu

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

INTENTIONALLY LEFT BLANK

Response to Comment Letter I95

Randi McKenzie

June 4, 2017

I95-1 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.

I95-2 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

Responses to Comments – Individuals

see the Biological Resources Thematic Response for additional information responsive to the comment.

I95-3 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.

I95-4 The comment is an introduction to comments that follow. No further response is required.

I95-5 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.

I95-6 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.

I95-7 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.

Responses to Comments – Individuals

- I95-8** 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.
- I95-9** 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.
- I95-10** 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.
- I95-11** 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.
- I95-12** 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.

I95-13 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.

- I95-14** 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

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.

- I95-15** 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

Comment Letter I96

On Sun, Jun 4, 2017 at 11:16 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name Craig Wilson

Address 5172 College Gardens Court

Phone number [6192065850](tel:6192065850)

Comments As detailed in this letter SDSU is attempting to rush through approval of a significant building project on an inappropriate site. This project would cause irreversible environmental damage and significantly affect the neighboring community with the increase in people and traffic in the area which have been inadequately addressed due to bias in both the studies and project goals. I wholeheartedly object to SDSU's plans to build on Aztec Canyon.

I96-1

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

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

Responses to Comments – Individuals

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Responses to Comments – Individuals

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I96-13

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.

I96-14

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.”

I96-15

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
mcollins@mail.sdsu.edu

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TO ALL CSU TRUSTEES AND ALTERNATES

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Response to Comment Letter I96

Craig Wilson

June 4, 2017

I96-1 The comment is critical of the process; however, preparation and public review of the Draft EIR followed all CEQA requirements. 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.

I96-2 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

Responses to Comments – Individuals

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.

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I96-4 The comment is an introduction to comments that follow. No further response is required.

I96-5 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.

I96-6 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.

I96-7 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.

Responses to Comments – Individuals

- I96-8** 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.
- I96-9** 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.
- I96-10** 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.
- I96-11** 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.
- I96-12** 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.

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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.

- I96-14** 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

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.

- I96-15** 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

Comment Letter 197

On Mon, Jun 5, 2017 at 6:51 AM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name Mark Chen

Address 5446 Hewlett 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
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.

197-1

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.

197-2

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:

197-3

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.

197-4

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.

197-5

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

197-6

Responses to Comments – Individuals

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.

↑
I97-6
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.

I97-7

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.

I97-8

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.

I97-9

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.

I97-10

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.

I97-11

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.

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I97-13

Responses to Comments – Individuals

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I97-13
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I97-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I97

Mark Chen
June 5, 2017

I97-1 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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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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I97-13 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.

I97-14 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 198

On Mon, Jun 5, 2017 at 7:13 AM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name Betty Jo DeBusschere

Address 5251 Hewlett Drive San Diego CA 92115

Phone number [619-265-0271](tel:619-265-0271)

Comments Proceeding with an EIR including Phase II and Phase III just because having a project available to be the first in line for future funds (ahead of other campuses) is an abuse of the of Long Beach's goal for good long term campus planning.

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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

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

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Responses to Comments – Individuals

to disclose this “reasonably foreseeable” project in the cumulative impacts of environmental analyses and EIRs conducted since 2010.

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I98-2
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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.

I98-3

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:

I98-4

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 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.

I98-5

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I98-6
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Responses to Comments – Individuals

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198-6
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.

198-7

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.

198-8

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.

198-9

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.

198-10

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.

198-11

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.

198-12

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, if conducted ambient noise level analysis on January 16, 2017, the Dr. Martin Luther King, Jr.

198-13

Responses to Comments – Individuals

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.

I98-13
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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.

I98-14

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.”

I98-15

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I98

Betty Jo DeBusschere

June 5, 2017

I98-1 The comment largely expresses the opinions of the commentator. 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 Proposed Project. The proposed project has been modified to eliminate Phases II and III. With these modifications, the proposed project will not result in significant unavoidable impacts, and all environmental impacts will be mitigated to less than significant. No further response is required because the comment does not raise an environmental issue.

I98-2 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.

Responses to Comments – Individuals

- I98-3** 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.
- I98-4** The comment is an introduction to comments that follow. No further response is required.
- I98-5** 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.
- I98-6** 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.
- I98-7** 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.
- I98-8** 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

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

I98-9 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.

I98-10 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.

I98-11 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.

I98-12 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, the 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.

- I98-13** 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.

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Responses to Comments – Individuals

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Comment Letter 199

From: **Save Aztec Canyon** <residents.college.area@gmail.com>
Date: Sun, Jun 4, 2017 at 8:17 PM
Subject: Thank you for helping save Aztec Canyon
To: mnelson@gmail.com, residents.college.area@gmail.com, LShinn@mail.sdsu.edu, TWhite@calstate.edu, TrusteeSecretariat@calstate.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu, mcollins@mail.sdsu.edu

Letter from the concerned residents of the College Area.

Name	Jerry Cress
Address	1848 Prairie View Lane
Phone number	619-294-8961

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

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199-1

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199-2

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199-5

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↑ 199-5
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.

199-6

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.

199-7

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.

199-8

Responses to Comments – Individuals

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.

I99-9

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.

I99-10

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.

I99-11

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

I99-12

Responses to Comments – Individuals

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.

I99-12
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.

I99-13

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.”

I99-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I99

Jerry Cress

June 4, 2017

I99-1 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 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.

I99-2 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.

I99-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I99-4** 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.
- I99-5** 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.
- I99-6** 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.
- I99-7** 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.
- I99-8** 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.
- I99-9** 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.

I99-10 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.

I99-11 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.

I99-12 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.

I99-13 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.

I99-14 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 I100

June 5, 2017

Laura Shinn ishinn@mail.sdsu.edu

RE: SDSU Dorm Project Proposal
Draft EIR Comments from James Hughes
31 year Resident of College View Estates

Dear Laura Shinn,

I, James Hughes, respectfully submit for consideration and request answers to my comments to the Draft EIR regarding the Dorm Development Project proposed by SDSU in the area around Remington Road, San Diego, CA, as follows:

1) What does the Project consist of, is there a Project?

SDSU put forward a Proposed Project for Student Dorm Housing on the western most border of Campus, the Project writings exceeded 1000 pages released to the Public and Public Hearings also took place. But on May 8, 2017 at a transcribed Public Hearing, SDSU President Hirshman put a statement into the record:

May 8, 2017 Statement from President Hirshman entered into the Public Record

"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."

What is the 'Project', if there is one, let me see it?
How do I study and review the Project?
How do I comment on the Project?
Give me the time to review and comment on the Project.

SDSU HAS FAILED TO DEFINE THE PROJECT, FORECLOSING ME AS A MEMBER OF THE PUBLIC MY RIGHT TO SEE, STUDY AND COMMENT, SDSU MUST RECIRCULATE A DRAFT EIR THAT INCLUDES A FULL PROJECT DESCRIPTION.

I100-1

I100-2

- 2) **SDSU has locked me out of the 'Process', SDSU is attempting to deny me my public rights.**

CEQA exists to protect the Public from the actions of Government. Per section 43852 of the California Code of Regulations, CSU/SDSU is required to act in accordance with an orderly/public process to protect the environment from its governmental actions. CSU/SDSU grades its own homework, in this Project Proposal it has failed to act in accordance with the spirit and letter of CEQA.

From Public Record Requests it has been determined the origins of this Project date to 2010 or earlier and that SDSU has been working on the Project in secret. SDSU never announced or engaged the Public with knowledge of the existence of this Project until just before the Christmas Holidays of 2016 when it gave Notice of the NOP. SDSU failed to describe the Project, claiming repeatedly that it was still being 'designed and studied' in the weeks following the release of the NOP foreclosing an opportunity to review or study the Project. SDSU published the Draft EIR including first ever elevation drawings, more than 1000 pages. SDSU represented these writings as just having been produced, that is the reason told to me why I have been denied the opportunity to see the writings, this is not true. Myself and others have asked President Hirshman and his administration to meet, on or off the record, to discuss the Project, the request has been ignored to date.

I100-3

SDSU has denied the rights afforded by CEQA to me as a member of the Public. SDSU has denied me personally at least 5 times to see, study and comment on this Draft EIR in violation of the letter and spirit of CEQA. SDSU should not be rewarded for violating CEQA, it should be required to start the NOP and Draft EIR process over.

- 3) **SDSU must study the 'Community Character' of a Project Proposal**

SDSU has selected a site at its property line, abutting a one and two story single family residential neighborhood. The Draft EIR and SDSU oral presentations make clear that SDSU believes it is only obligated to consider impacts and mitigation on its footprint. SDSU is defining the 'Community Character' of this Project as ending at its property line, this is non-sense. The proposal would have material and destructive impacts on the immediate Neighborhood and the Neighborhood further to the west, consequently, the Neighborhoods are part of the Community Character of this Project, impacts and mitigation in the neighborhoods would apply to the project as proposed.

I100-4

SDSU has an obligation to include the neighborhoods in its study, impacts and mitigations. SDSU should be required to recirculate a Draft EIR that includes this additional required information.

4) Bulk and Scale is not within the 'Community Character'

SDSU designed a Mega Dorm Project with Bulk and Scale typical of Manhattan, New York City. The density of this project dwarfs any development on the SDSU campus and almost certainly all other CSU campus'. I have been unable to locate any development of this density in San Diego County including the largest Office, Hotel or Casino developments.

The Project is completely out of Bulk and Scale with anything on Campus and must be revised consistent with the Community Character of the site SDSU has selected.

5) SDSU has selected a site on Campus requiring it to destroy Native Canyon

SDSU has selected a site consisting of Native Canyon, roughly 85% of the proposed development will require grading that will forever change the Canyon and the surrounding habitat. The Canyon is believed to be the last natural canyon on the SDSU Campus.

This environmental destruction is not required to fulfill SDSU plan to develop additional student housing on Campus. SDSU must propose an alternative site

6) SDSU access to site is on bi-directional, single lane City Street.

In and out access to an existing dorm building 'Chapultepec Hall', is a single lane, bi-directional City Street, Remington Road. Chapultepec fronts on Remington, there is no stopping or turn out area for friends, family, Uber, Pizza Hut, repairs and maintenance, moving week, etc. Under the current usage of the roadway, bike lane and sidewalk, all are blocked roughly 30% of the time by vehicular traffic serving the existing single dorm building. SDSU has not proposed any meaningful alteration to the existing City roadway, nor can they make alterations without carving space from modern athletic facilities.

I100-4
Cont.

I100-5

I100-6

I100-7

Responses to Comments - Individuals

SDSU proposes to increase the student population by as much as a factor of 6, from roughly 590 beds now to as many as 3600 beds. SDSU has failed to study, design and mitigate this issue.

I100-7
Cont.

7) SDSU has identified 16 other sites on Campus capable of this Project.

SDSU has not studied any of these alternative sites in detail, most or all of the alternative sites are environmentally superior to the selected site. Most of the sites are in a superior location to the buildings and amenities on the SDSU Campus for students. Alternative sites include but are not limited to Parking lot 15, Parking lot 17, Parking lot 2A, and on 55th Street a group of 1960's apartment houses controlled by SDSU known collectively as Albert's apartments.

I100-8

SDSU has an obligation to study alternative sites per CEQA in the same detail as the selected site, they have not done so. SDSU should be forced to study these alternative sites in the same detail as the currently selected site for a recirculated Draft EIR.

Submitted by email on June 5, 2017.

Jim Hughes

Response to Comment Letter I100

Jim Hughes

June 5, 2017

I100-1 The comment is an introduction to comments that follow. No further response is required.

I100-2 The comment regarding President Hirshman's May 8, 2017, statement is noted. In response to the statement, 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. Further, the Draft EIR was circulated for a 45-day public review period beginning April 21, 2017 and ending June 5, 2017. Because the Draft EIR does not contain significant new information, a new EIR or recirculation of the Draft EIR is not warranted.

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 and Phase II 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 significant new information within the meaning of CEQA and, as such, recirculation is not required.

Responses to Comments - Individuals

I100-3 The comment is noted. The Draft EIR was circulated for a 45-day public review period beginning April 21, 2017 and ending June 5, 2017.

Further, 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 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.

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

I100-4 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 EIR and is contained in Section 4.1, Aesthetics.

In addition, because the EIR does not contain significant new information, a new EIR or recirculation of the EIR is not warranted.

A new EIR or a recirculation of the 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.

Responses to Comments - Individuals

The commenter raises concerns that an analysis of impacts to community character would be focused entirely on the project site. In accordance with CEQA, Section 4.1, Aesthetics, of the EIR evaluates potential aesthetic impacts concerning the Project and the existing visual quality and character of the site and surrounding area. The surrounding area includes residential land uses of the College View Estates Area (CVEA) and land uses on the SDSU campus. Existing uses and the form, scale, bulk, and mass displayed by existing uses in the surrounding area are considered in the existing visual quality and character of the site and surrounding area analysis presented in Section 4.1, Aesthetics, of the EIR. Because the EIR includes the items discussed by the commentator, the EIR need not be recirculated to present these items.

- I100-5** The bulk and scale of the Project is described and analyzed in Section 4.1, Aesthetics, of the EIR. Section 4.1 considers the bulk and scale of existing development on the SDSU campus and development in the surrounding area including residential uses in the CVEA in the assessment of potential Project impacts to the existing visual quality and character of the site and surrounding area. 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. The commenter's opinions regarding the bulk and scale of the Project will be included as part of the record and made available to the decision makers prior to a final decision on the Project.
- I100-6** 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 does not impact the canyon.
- I100-7** 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.
- I100-8** 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 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 I101

From: **Lyndy Cuevas** <lyndy14@gmail.com>
Date: Mon, Jun 5, 2017 at 8:35 AM
Subject: Formal Comments for SDSU DEIR (4/21/17)
To: LShinn@mail.sdsu.edu
Cc: TWhite@calstate.edu, TrusteeSecretariat@calstate.edu, Presidents.Office@sdsu.edu,
PresOffi@mail.sdsu.edu, mcollins@mail.sdsu.edu

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Lyndy Cuevas
5009 College Gardens Court
San Diego, CA 92115
Lyndy14@gmail.com

6/5/2017
Laura Shinn
Director, Facilities Planning, Design, and Construction San Diego State University
5500 Campanile Drive
San Diego, California
92182-1624
LShinn@mail.sdsu.edu

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.

I101-1

SDSU's DEIR is insufficient and fails to identify all significant: traffic impacts to all surrounding areas, environmental impacts: to fauna, wild life, blocked natural light, sound and manmade light. Consideration of alternative sites for project on existing disturbed land: 55th Street north of the ARC, International Student Center, New soccer field/ parking lots: 6, 6B, 2A, 9 and 15. Explain 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.

I101-2

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:

I101-3

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

I101-4

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.

I101-4
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2. "Proposed need" with SDSUs adoption of "The Sophomore Success Program". I question this immediate need of 2,700 beds with the adoption of this program. Please provide the financial gain this mandated program will be to SDSU's bottom line. This program is not about helping sophomores, it's about a steady stream of income for SDSU. Provide the cost and financial figures this program will add to a sophomore's fees per semester? Explain "out of the area"? This increase in tuition will be a financial burden for middle income families. Low income families may qualify for financial aid, middle income families do not qualify for financial aid putting a college education further out of reach for the average middle class student. College loan debt should not be an option for these students. The "Success Program" mandated live-on requirements for 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.

I101-5

3. 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

I101-6

on their own EIRs as is faced by private entities when they seek to develop. SDSU cannot provide itself special treatment.

I101-6
Cont.

4. 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.

I101-7

5. 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.

I101-8

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. 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.

I101-9

7. 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, snakes and other plant and animal species. Other local surveys for undergrounding identified those species in the canyon system of

I101-10

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.

I101-10
Cont.

8. 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.

I101-11

9. 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.

I101-12

10. 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

I101-13

Responses to Comments - Individuals

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.

I101-13
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11. SDSU Master Plan – I would like to see SDSU's Master Plan for the Campus. This plan should be shared with all surrounding areas impacted by SDSU's development, in a timely manner. As a neighbor for the last 20 years, this greatly impacts me. All small building projects add up and need to be properly evaluated for impacts to the surrounding community.

I101-14

12. 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. With Remington impacted with traffic, cars will head west through College View Estates. Remington does not have adequate planning for Uber, Lyft, passenger zone pick up and drop off areas, delivery vehicles, student move in and move out pull outs. The 3 parking spaces currently at Chapultepec Hall: 2 are for the disabled and 1 is for a Aztec vendors with a permit. Students need a pull out area for the services listed above. Parking in the red is not acceptable. No one enforces the red curb, so, it is not currently working now. Imagine adding another 2,700 students! Also please explain where your student to car ratio came from? Please have traffic impacts analyzed for the worstcase scenario, not your ratio analysis. This is not accurate, note, sophomores with these extra fees need to work. They will not be taking the trolley to work.

I101-15

13. Building height and design. SDSU, I ask you to be a good neighbor to College View Estates. I am a local San Diegian and graduated from SDSU. I currently attend football games, basketball games, Osher Learning Programs and enjoy SDSU Theater also. I moved to College View Estates in 1997. I have been a member of the Alumni Association at times. I am on your call list and have given financially also. Now, due to the proposed PHASE 2 and PHASE 3 projects, I will not support SDSU in the future. These proposed projects are the largest, highest, monoliths of design I have ever seen. There is no architectural design here, just maxed block warehouse building design. No variation in massing or undulating forms. The design scale of the proposed architectural design is not in scale with the area or designed to a human scale from the street or a backyard.

I101-16

Responses to Comments - Individuals

These proposed buildings are the largest buildings outside of downtown San Diego. The tallest building in Mission Valley is 13 stories. Shame on the City of San Diego Building Planning Department for finding the proposed 14 story buildings acceptable to be built as proposed. Shame on SDSU for proposing a maxed out building of this scale and height, next to College View Estates and in a natural canyon to add further insult. This is a huge F U in a design and proposal. I have viewed all the buildings surrounding the SDSU area. Chapultepec Hall is the largest at 11 stories and in my view a mistake. College Ave – South Campus building is 6 stories with undulating forms and variations in massing. The new student union is only 4 stories and it feels much larger and has some architectural style. Montezuma between Remington and College: University Towers is 9, all other buildings on this street are 4 and 3 stories high. Lindo Paseo all new buildings 4 or 5 stories. On campus the largest building is 4 stories. Buildings to be relatable to humans and create an intimate space need to be in scale with the surrounding environment. Why not build 14 story buildings in the middle of Campus? Why is it acceptable to SDSU to build such a large scale, block style building next to a neighborhood? Aztec Canyon creates a natural buffer between College View Estates and Chapultepec Hall. No sensibility, no sustainable, green building design principals are being considered in the design of Phase 2 and 3.

SDSU be a good neighbor. College View Estates has always supported you. We have many SDSU professors and SDSU Alumni here. Hoping you will do the right thing.

Sincerely,
Lyndy Cuevas

CC: TWhite@Calstate.edu, TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu,
PresOffi@mail.sdsu.edu, mcollins@mail.sdsu.edu

NOTE: PLEASE DISTRIBUTE TO ALL CSU TRUSTEES AND ALTERNATES

I101-16
Cont.

I101-17

Response to Comment Letter I101

Lyndy Cuevas

June 5, 2017

I101-1 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.

I101-2 The comment that the EIR is “insufficient” and that there are “feasible alternatives” 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.

I101-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments - Individuals

- I101-4** 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.
- I101-5** 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.
- I101-6** 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.
- I101-7** See response to comment I101-6.
- I101-8** 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.
- I101-9** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I101-10** Please refer to response to comment I26-14.

I101-11 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, 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.

I101-12 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 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

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 Chapters 4.5, 4.7, and Appendices 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.

I101-13 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 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 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. 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 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.

I101-14 This comment requests information regarding the Campus Master Plan. 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.

I101-15 The significant and unavoidable traffic impacts referenced in the comment would only occur with implementation of Phase III. Because the proposed project no longer includes Phase III, there will be no significant and unavoidable traffic impacts. 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.

I101-16 This comment is similar to comment I40-16. Please refer to response to comment I40-16.

I101-17 The comment is a conclusion to previous comments. No further response is required.

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Comment Letter I102

On Mon, Jun 5, 2017 at 8:58 AM, Nancy and Jim <talljranch@earthlink.net> wrote:

From Nancy and Jim Jones

5409 Hewlett Drive

San Diego, CA 92115

Laura Shinn

Director, Facilities Planning, Design, and Construction

Ms. Shinn:

The DEIR for SDSU's plans for six dorm towers in the undeveloped, biologically sensitive, very high fire hazard canyon (hereafter "Aztec Canyon") directly west of Chapultepec Hall 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.

I102-1

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 (this is not a true requirement); 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 last minute and now recommends destruction of Aztec Canyon to mitigate its own delays. SDSU should have allocated time for environmentally responsible site selection.

I102-2

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.

I102-3

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.

I102-4

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.

I102-5

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

I102-6

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.

I102-6
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.

I102-7

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.

I102-8

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

I102-9

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,

I102-9
Cont.

9. SDSUs analysis of noise impacts is inadequate. A new study needs to be conducted. In addition, 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, not to mention unreported noise from students' loud music and "partying".

I102-10

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 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.

I102-11

11

Thank you for your consideration of our comments,

Nancy and Jim Jones

Response to Comment Letter I102

Nancy and Jim Jones

June 5, 2017

I102-1 The comment is an introduction to comments that follow. No further response is required.

I102-2 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.

I102-3 See response I102-2.

I102-4 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.

Responses to Comments - Individuals

- I102-5** 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.
- I102-6** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I102-7** Please see the Biological Resources Thematic Response for information responsive to this comment.
- I102-8** 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 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 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.
- I102-9** 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 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 Chapters 4.5, 4.7, and Appendices 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.

- I102-10** 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 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 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. 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 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.

- I102-11** The significant and unavoidable traffic impacts referenced in the comment would only occur with implementation of Phase III. Because the proposed project no longer includes Phase III, there will be no significant and unavoidable traffic impacts. 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

Comment Letter I103

On Mon, Jun 5, 2017 at 9:10 AM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name	Melanie Moomjian
Address	4933 Chaparral Way
Phone number	619-222-5000

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

I103-1

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

I103-2

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

I103-2
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:

I103-3

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.

I103-4

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.

I103-5

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.

I103-6

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.

I103-7

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.

I103-8

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

I103-9

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.

I103-9
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.

I103-10

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.

I103-11

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.

I103-12

Responses to Comments - Individuals

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.

1103-13

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."

1103-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I103

Melanie Moomjian

June 5, 2017

I103-1 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. 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 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 Proposed Project meets these requirements or proposes alternative materials and methods that provide the same practical effect as the requirements. Therefore, the Proposed 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 Proposed Project’s new buildings. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.

I103-2 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.

Responses to Comments - Individuals

- I103-3** The comment is an introduction to comments that follow. No further response is required.
- I103-4** 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.
- I103-5** 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.
- I103-6** 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.
- I103-7** 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.
- I103-8** 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.

Responses to Comments - Individuals

- I103-9** 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.
- I103-10** 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 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.
- I103-11** 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 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 Chapters 4.5, 4.7, and Appendices 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.

I103-12 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 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

Responses to Comments - Individuals

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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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, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

I103-13 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, 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.

I103-14 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 I104

On Mon, Jun 5, 2017 at 9:11 AM, Camille Jorgensen <cajor001@mail.goucher.edu> wrote:

SDSUs DEIR is insufficient and fails to identify all significant: traffic impacts to all surrounding areas, environmental impacts: to fauna, wild life, blocked natural light, sound and manmade light.

I104-1

Please reconsider the ramifications that this project will have not only for current residents of this neighborhood but for the larger ecosystem that we are a part of.

I104-2

My family has lived in the shadow of SDSU for 19 years and have both suffered and benefited from the whims of the administration. The most recent addition to the corner of Montezuma and College has brought with it a new set of problems for residents and I shudder to think what yet another gargantuan housing project will bring us.

I104-3

Please consider the effects that this project will have on my neighborhood, the canyon, and current and future San Diego State students.

I104-4

Sincerely,
Camille Jorgensen

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Response to Comment Letter I104

Camille Jorgensen

June 5, 2017

- I104-1** The comment is an introduction to comments that follow. No further response is required.
- I104-2** 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.
- I104-3** 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.
- I104-4** 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.

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Comment Letter I105

June 3, 2017

Laura Shinn, Director
Facilities Planning, Design and Construction
Business and Financial Affairs
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624

Subject: DRAFT SDSU New Student Housing Project Environmental Impact Report dated April 2017

Dear Ms. Shinn

The text of a letter submitted January 19, 2017 during the scoping process is shown below. This letter is documented in Appendix A of the DEIR for the New Student Housing Project EIR. The DEIR does not adequately cover two elements involving noise intrusion discussed in this letter.

I105-1

- 1) Either banning the use of fixed and portable electronic devices surrounding the exterior of the dormitory complex or a plan to mitigate the use of such devices. There is extensive discussion regarding the construction phase I, II, and III but little regarding noise intrusion during the many follow-on years of operation. Without further assessment the final EIR must include noise level is SIGNIFICANT AND UNAVOIDABLE.

I105-2

- 2) The overflow movement of the estimated 2,700 students wishing to avoid campus rules by transporting self(s) to the residential properties and streets of College View Estates. This includes day time and late night smoking plus the many activities usually associated with youth parties.

I105-3

SDPD considers 911 system calls regarding student illegal noise and other activities as a non-emergency priority 3. The priority 3 level calls are at such low level of response that it can take over 70-90 minutes to respond. This inadequate support situation must be discussed in the final EIR and include a plan to manage these activities else the noise level is SIGNIFICANT AND UNAVOIDABLE.

I105-4

Please comment if SDSU police will support the City of San Diego police in the management of student noise and illegal activities within one mile of the campus by taking direct calls from the local community. This could mitigate this noise intrusion to a less than significant level.

I105-5

Here is a link to an excellent Voice of San Diego article "SDPD Now Takes Hours to Respond to Non-Emergency Calls". The on-line article researches the response times for a priority 3 SDPD 911 system call.

I105-6

http://www.voiceofsandiego.org/topics/public-safety/sdpd-now-takes-hours-to-respond-to-non-emergency-calls/?utm_source=Voice+of+San+Diego+Master+List&utm_campaign=4d7b4bc296-Morning_Report&utm_medium=email&utm_term=0_c2357fd0a3-4d7b4bc296-81843893&goal=0_c2357fd0a3-4d7b4bc296-81843893

Responses to Comments - Individuals

Text of letter submitted and included in Appendix A of the DEIR

Re: NOP of a Draft EIR for Dormitory Complex Centered Around Chapultepec Residence Hall
SUBJECT: Noise intrusions into City of San Diego Residential Properties. Section 5.12

January 19, 2017

Dear Ms. Shinn,

Noise levels will increase and intrude into residential homes on properties next to the project area, especially the Phase 2 and Phase 3 structures. How do you mitigate this noise?

Our experience shows that the vast majority of noise intrusion into the residential community can be mitigated by banning electronic sound generation especially from the exterior open areas of the project. This includes electronic music that contains low frequency waves. Waves go through home walls at even a low amplitude. The EIR should consider a band on exterior electronic sound generation in the project area, ... all hours.

An interview with SDSU and San Diego CRO police officers can document the "mass" movement of students usually during the late hours of the evening searching for a party in the walkable residential neighborhood. The word gets out on social network and hundreds of students will appear many times uninvited. Consider all three phases of this project built out with 2,700 + students having access to a minimum amount of automobiles.

The EIR should address how to manage and mitigate this unique noise intrusion. Today a residential homeowner living in San Diego must FIRST call the non-emergency police line to report the noise; this can involve a 30 to 40 minute wait time; then an unknown time for police response. This problem can be mitigated with a telephone call for such activity going directly to the SDSU police and a standard for response established... say 15-20 minutes for the police to arrive on-site.

Regards

Gary DeBusschere, 5251 Hewlett Drive, SD CA 92115 debusschere01@yahoo.com

I105-7

I105-8

I105-9

I105-10

I105-11

Response to Comment Letter I105

Gary DeBusschere

June 3, 2017

I105-1 The comment is an introduction to comments that follow. No further response is required.

I105-2 The comment claims that the project would exacerbate existing noise issues regarding noise from the residence hall, including amplified music, and the “mass movement” of students at night searching on foot for parties. The commentor suggests that banning electronic sound generation, particularly in outdoor areas, would be one means of noise mitigation. The commentor also suggests that SDSU and code enforcement officers could streamline their response process.

Pursuant to the SDSU Code of Conduct that is 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. Additionally, the proposed project would not result in an increase in the full-time-equivalent (FTE) student population, therefore the numbers of students seeking out parties in the neighborhoods would be unlikely to change substantially as a result of the project. Furthermore, because SDSU no longer plans to pursue the development of Phases II and III, any potential noise effects from the Project to nearby single-family residences located to the northeast would be substantially lessened.

I105-3 The comment addresses general subject areas, which received extensive analysis in the EIR. The Project’s impacts relative traffic and movement were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the EIR. 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.

I105-4 The comment addresses the City’s response to noise complaints on the SDSU campus. However, 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 Phases II and III, in response to public comments, the proposed project has been modified to eliminate Phases II and III from the project. Please see Final EIR, Preface, for additional information regarding the

Responses to Comments - Individuals

- project modifications. Therefore, because Phases II and III are no longer part of the proposed project, the comments are no longer applicable.
- I105-5** The comment seeks information regarding the jurisdiction of SDSU Police over noise complaints. As noted in the response to comment I105-4, SDSU Police handle all noise complaints from on-campus sources using the same regulations, criteria, and authority as the City's municipal code. Relatedly, pursuant to the SDSU Code of Conduct provided to all students under 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. With regards to potential noise effects from Phases II and III, as noted in the response to comment I105-4, the proposed project has been modified and no longer includes Phases II and III Please see Final EIR, Preface, for additional information regarding the project modifications.
- I105-6** 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.
- I105-7** The comment is an introduction to comments that follow. No further response is required.
- I105-8** Please see response to comment I105-2.
- I105-9** Please see response to comment I105-2
- I105-10** 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.
- I105-11** 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

Comment Letter I106

On Mon, Jun 5, 2017 at 10:16 AM, Vi Calvo <ycalvo1228@gmail.com> wrote:

Hello Laura,

One more comment in regards to the DEIR:

I would be open to a larger (i.e., more stories) for the building slated for phase 1 in the existing lot that is east of the Chapultepec dorms. If additional stories were added to this proposed site and there weren't any dorms built into the canyon, I imagine there would be reduced impact to the canyon environment, it would be aesthetically more pleasing (since Chapultepec dorms are already quite high - i.e., it wouldn't be such a jump from single story homes to tall dorms), and perhaps traffic would be more inclined to use the 55th Street SDSU exit/entrance rather than through College View Estates neighborhood. Would an EIR be possible for this kind of proposal?

I106-1

In all, I primarily against the proposed dorms that would be built in the canyon. But the dorm built on the existing parking lot east of Chapultepec is ok.

I106-2

Thank you for your time,
Vi Calvo

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Response to Comment Letter I106

**Vi Calvo
June 5, 2017**

- I106-1** 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.
- I106-2** 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 EIR. For that reason, no further response to this comment is provided.

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Responses to Comments - Individuals

Comment Letter I107

Mark Nelson
5417 Hewlett Drive
San Diego, CA 92115
menelson@gmail.com

June 5, 2017

Laura Shinn
San Diego State University
L.Shinn@mail.sdsu.edu

SUBJECT: Comments to April 21, 2017 DEIR for West Campus Residential Housing

Attached are a set of comments on the CEQA-inadequate DEIR.

Sincerely,

Mark Nelson

**Mark Nelson Comments on 4/21/17 Issued EIR on
SDSU New Student Housing Project
Environmental Impact Report
Section 2 – Project Description**

MEN-COMMENT-2.1

SDSU's Project is Based on Invalid Assumptions – Currently Available Research Demonstrates Affirmatively that Sophomore Success is NOT Linked to On-campus Housing (Section 2)
SDSU's entire project, and especially its preferred alternative, hinge on the unfounded assertion of their Sophomore Success program that SDSU sophomore success relies on living on campus. Further, the environmental damage from non-mitigatable significant impacts, and all other CEQA EIR impacts, grows directly from the false assumptions of the Sophomore Success program. Current research on student engagement and performance, the National Survey of Student Engagement conducted by Indiana University and the Association of College and University Housing Officers clearly demonstrates that on-campus housing is not a significant factor on student or sophomore success. It further recognizes that on-campus housing has had an increasing lesser impact on student engagement and performance over the past decades. SDSU has used outdated research to execute on the publicly stated bias of this SDSU West Campus project's officer sponsor, Vice President Robert Schulz in his interview to The Daily Aztec "the construction ... of buildings that bring in revenue."
(<http://www.thedailyaztec.com/82227/news/java-library-not-up-to-code-for-earthquakes/>)

This is a revenue project for SDSU as it seeks to expand its university footprint. The misrepresentation by SDSU has created a EIR with a falsified fact basis overall by relying on aged research. Specifically, the NSSE report and summary presentation (<http://nsse.indiana.edu/pdf/presentations/2015/NSSE%20ACUHO-I%20Presentation.pdf>) The Relationship of On-Campus Living with Student Engagement from 2015 makes the following findings: **1) On most engagement measures, there were few differences between students living on campus and those within walking distance, and 2) Where differences existed, they were generally with those farther than walking distance.** As a result, SDSU has far overstated the benefits of students living on campus, and further, the proportion of students that would benefit at all. SDSU has not stated what proportion of students live beyond walking distance, because they are the ONLY students that the research supports moving on campus.

Furthermore, 2016 follow-up research finds that there are no longer essentially NO BENEFITS to living on campus due to changes over the past decades, with the following statement "Changing Landscape" has led to "Student Residence has an INCONSEQUENTIAL effect," (http://nsse.indiana.edu/pdf/presentations/2016/ACPA_2016_Graham_et_al_paper.pdf) Consequently, the work by Indiana University with its current and long term, longitudinal research demonstrates that there are INCONSEQUENTIAL benefits to students from living on campus, and as a result, SDSU's true lack of need for SDSU sophomore housing invalidates the entire EIR. SDSU's EIR is invalid because it is based on an outdated and false premise and it should not be certified.

I107-1

Additionally, SDSU wrongly refers to the graduation rates of its 2009 class cohort. SDSU ignores all principles of statistical sampling and self-selection bias and asserts, **WRONGLY**, that SDSU sophomores who **CHOOSE** to live on campus have the characteristics (ACT, SAT, high school GPA, age, country of origin, ethnographics, demographics, socioeconomic, etc.) as the general SDSU sophomore population. SDSU's study, and all studies like them that are relied upon are meaningless. There is no basis to assume that SDSU sophomores that are **COERCED** to live on campus will mirror performance of SDSU sophomores who **CHOOSE** to live on campus. Self-selection bias is well understood, cannot be ignored, and is a basic tenant of statistics and social science.

Additional research presented to the Association of College and University Housing Officers continues to demonstrate that SDSU is relying on old, inaccurate, and inconclusive research to justify its construction of more dormitories and COERCISION of sophomores to live on campus. The research states **"Despite the intuitive appeal of improving outcomes through residential settings, the empirical evidence is far from conclusive or complete, and much of it is dated. Previous studies demonstrate correlations between campus living settings and outcomes such as persistence, but these studies generally have major limitations. Most studies have not fully addressed selection biases when comparing outcomes for students who choose to live in campus housing (or certain types of campus housing), versus comparison groups such as students who choose to live off campus. Therefore it is unclear whether differences in outcomes across groups are due to true effects of residential settings, unmeasured differences in student characteristics."** (<http://www.acuho-1.org/Portals/0/docs/es/EisenbergResearchNarrative.pdf>)

SDSU cannot make trade offs regarding non-mitigatable significant environmental damage based on outdated, inaccurate, or inconclusive research.

One last factor, SDSU sophomores **DO NOT SEEK TO LIVE ON CAMPUS**. Only 22% of SDSU sophomores in SDSU's own student survey indicated that if **ALL THEIR HOUSING PREFERENCES WERE MET** (that is, if the dorm were essentially **PERFECT**) they would choose the dorms. Only 22% of SDSU sophomores surveyed would choose to live in the perfect dorm. This is part of SDSU's recent Student Housing Strategic Plan.

In summary, SDSU's Sophomore Success program is invalid, because 1) it ignores research and ascribes success factors to living on campus; 2) it ignores basic statistical sampling techniques and relies on a biased, self-selection of on campus SDSU sophomores from 2009; 3) it ignores that only 1 in 5 SDSU sophomores would live on campus if the dorms completely met their preferences, and 4) it asserts extrapolates, without any support, the results of first time freshman required to live on campus vs. those who live in an alternative situation and concludes that the **DORMS** were the reason for performance. SDSU assertions are not based on the facts, nor are they accurate.

SDSU has publicly stated that it seeks to build revenue producing buildings, and this motive is not even included in the objectives of this revenue-raising, student funded project.

1107-1
Cont.

MEN-COMMENT-2.2

SDSUs Project is Based on Invalid Assumptions – Sense of Community and Connectedness NOT Linked to On-campus Housing (Section 2)

SDSU asserts without evidence, and in fact, in the face of significant research to the contrary, that “Data show that students who live on campus are better prepared academically, enjoy an increased sense of community and campus connectedness.” To the absolute contrary, data show that there is an INCONSEQUENTIAL impact. Whether SDSU deliberately falsified information, or used incompetent research, SDSUs project definition is invalid and the EIR should not be certified. Current research demonstrates that on-campus housing is not a significant factor on student success. This misrepresentation by SDSU has created a EIR with a falsified fact basis. Specifically, the NSSE report and summary presentation ([http://nsse.indiana.edu/pdf/presentations/2015/NSSE%20ACU\(HC-I\)%20Presentation.pdf](http://nsse.indiana.edu/pdf/presentations/2015/NSSE%20ACU(HC-I)%20Presentation.pdf)) The Relationship of On-Campus Living with Student Engagement from 2015 makes the following findings: 1) On most engagement measures, there were few differences between students living on campus and those within walking distance, and 2) Where differences existed, they were generally with those farther than walking distance. As a result, SDSU has overstated the benefits of students living on campus by ascribing any benefits, and further, SDSU has overstated the proportion of students that might benefit from on campus living by failing to take into account what proportion of SDSU sophomores already live within walking distance and gain the same benefits as living on campus. Furthermore, 2016 follow-up research finds that there are NO BENEFITS to living on campus due to changes over the past decades (perhaps such as social media), and that research makes the following statement “Changing Landscape” has led to “Student Residence has an INCONSEQUENTIAL effect.” (http://nsse.indiana.edu/pdf/presentations/2016/ACPA_2016_Graham_et_al_paper.pdf)

In summary, the work by Indiana University with its current and long term, longitudinal research demonstrates that there are INCONSEQUENTIAL benefits to students from living on campus, and as a result, SDSUs lack of need for SDSU sophomore housing invalidates the entire EIR. SDSUs EIR is invalid because it is based on a falsified premise and it should not be certified.

MEN-COMMENT-2.3

SDSUs Project is Based on Invalid Assumptions – Higher/Faster Graduation Rates are NOT Linked to On-campus Housing (Section 2)

SDSU asserts using invalid statistical analysis as evidence, and in fact, in the face of entire academic treatises on the non-representativeness of self-selection to overall populations, that living in the dorms increases graduation rates. Students who CHOOSE to live in the dorms as SDSU sophomores are very dissimilar demographically, psychographically, socioeconomically, ethnologically, and with respect to point of origin status compared to the overall SDSU sophomore class. They are vastly more likely to be international students or students who are already out of state or to carry some personal need or reason, or have some different personal characteristics. “Self-selection bias” is well understood and highlighted in the statistics and social science literature.

For example, a recent peer reviewed study explains “Self-selection bias is the problem that very often results when survey respondents are allowed to decide entirely for themselves whether or not they want to participate in a survey. To the extent that respondents' propensity for

I107-2

I107-3

participating in the study is correlated with the substantive topic the researchers are trying to study, there will be self-selection bias in the resulting data. In most instances, self-selection will lead to biased data, as the respondents who choose to participate will not well represent the entire target population.” (<http://methods.sagepub.com/reference/encyclopedia-of-survey-research-methods/n526.xml>) In SDSU’s asserted case, students “self-selected” to live in the dorms, and are therefore creating bias making any extrapolation to the general SDSU student population invalid. The results that SDSU inappropriately used to falsely deduce that SDSU sophomores that CHOOSE to be in the dorms graduate sooner cannot be extrapolated to students who are COERCED by rule to live on campus by SDSU.

For illustration, the following hypothetical is presented. A similar assumption would be to compare the graduation rates of a group of students who CHOOSE to go to Harvard University with a randomly drawn group of students who are COERCED by rule to attend Harvard. The randomly selected group will have far different characteristics than the self-selected group, and as a result, far different graduation rates.

SDSU further asserts causality, that is, that living in the dorms was the cause of higher GPAs and graduation rates without any evidence whatsoever. It could just as easily be that those students were introverts, had unusually high IQs, were better prepared from high school, had high SATs and ACTs, spoke limited English, or perhaps there is no causation whatsoever. In any event, SDSU is asking for the privilege of making irreversible destruction to the environment, and the privilege via CEQA and the EIR cannot be based on invalid research and analysis methods. SDSU has made no valid case that SDSU sophomores who are COERCED to live on campus will perform any differently than if they moved off campus.

Because of improper statistical sampling and evaluation techniques, and lack of any causal analysis that living in on-campus housing was determinative to graduation rates or GPAs, SDSU’s conclusion of increased graduation rates are invalid. SDSU’s lack of need for SDSU sophomore housing invalidates the entire EIR. SDSU’s EIR is invalid because it is based on a falsified premise of self-selection students and it should not be certified.

MEN-COMMENT-2.4

SDSU’s Project Definition Relies on Falsified Information – Carrier Johnson West Campus study began no later than 2010, and should have been disclosed as a cumulative impact of the 2007 Campus Master Plan EIR that was certified by the Trustees in 2011. (Section 2)

SDSU asserts “In 2013, prior to the implementation of the Sophomore Success program, SDSU contracted with Carrier Johnson to prepare a capacity study and preliminary site design for a residential complex to be located on the west side of campus.” In reality, SDSU had work underway on the West Campus Plan in 2010.

Per the LandLab.com website “SDSU West Campus Housing Masterplan; Location: San Diego, CA, USA; Size: 16 Acres; Partners: Carrier Johnson Architects; Client: San Diego State University. Budget: N/A; Completed: 2010 (Emphasis added)

“LandLab collaborated with Carrier Johnson Architects on the master plan for the West Campus housing at SDSU. The landscape draws inspiration from historic gardens and architecture of the

I107-3
Cont.

I107-4

Alhambra. Perched high on a hillside, the patios, terraces and roof deck are oriented to capture views of mountains beyond. Bougainvillea covered arcades direct the user into the main entry points and public dining areas. Series of courtyards pique your interest, and create a variety of spaces for both the public and for residents. A gated pool and large fire pit activate 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, lies grand staircase that provides a direct route from the main dining terrace down to the Canyon Trails (and access road). Along this same access road, small cafe is conveniently located, to grab a quick latte on your way to class, or a sunny place to hang out and meet up with friends.”

A screenshot is inserted below and was captured from (land-lab.com/project/sdsu-west-campus-housing-masterplan/) and (<http://webcache.googleusercontent.com/search?q=cache:bUZJJd0Bw2YJ:land-lab.com/project/sdsu-west-campus-housing-masterplan/+&cd=1&hl=en&ct=clnk&gl=us>) A full PDF of the Land-Lab website page is attached as a separate file.



As a result of not disclosing the 2010 work in the 2011 Certified EIR as a cumulative impact of the 2007 Campus Master Plan, SDSU has flaunted CEQA and the EIR process in prior actions. SDSU has for over 6 years had knowledge of this plan, and by failing to disclose it to the

I107-4
Cont.

community, or in the EIR process, has placed the community and EIR commenting parties in a MULTI-YEAR disadvantage. As a result, SDSU must extend the open period for EIR comments as a direct result of its CEQA violation of non-disclosure of "reasonably foreseeable" development. That is the appropriate CEQA test of relevance, and that was clearly met, and ignored, by SDSU.

I107-4
Cont.

MEN-COMMENT-2.5

SDSU's Project Goals and Objectives are Based on an unsubstantiated Sophomore Success Program and Fail CEQA Legislative Intent (Section 2)

Each of the specific project goals listed below are arbitrary, unsupported, and developed only to force development on West Campus. SDSU failed the legislative intent of CEQA as written in the law "[I]t is the policy of the state to... (b) Take all action necessary to provide the people of this state with clear air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise," and "the long-term protection of the environment shall be the guiding criterion in public decisions." SDSU completely ignored, and even flaunted the letter and intent of CEQA by developing arbitrary Goals and Objectives with NO thought toward taking "all action necessary." (<https://www.pacificresearch.org/article/a-primer-on-the-california-environmental-quality-act-ceqa/>)

I107-5

In fact, SDSU put its desire to build more dorms above all else, including seismic safety and its environmental obligations. VP Robert Schulz in a recent Aztec Daily article said that the university has focused on the construction and renovation of buildings that bring in revenue, like new student housing ... because students support a fee to cover the costs of them. Additionally, all of the unnecessary restrictions and constraints that SDSU placed on the execution of its dorm expansion project directly restrict the intent of CEQA to find the least environmentally impactful solution. SDSU's actions are little different in practice than stating "we have an undeveloped parcel and the project must be on it."

Because SDSU has failed to faithfully implement CEQA by failing to consider the environment during development of Goals and Objectives, the EIR cannot be certified.

MEN-COMMENT-2.6

SDSU's Project Goals and Objectives are Arbitrary and Unsubstantiated and Contrary to the Legislative Intent of CEQA (Section 2)

SDSU's objective #1 to "Create a distinct west campus housing neighborhood similar to the student residential neighborhood on the east side of campus, that is inviting and safe, that has a distinct identity, and that provides students with supportive amenities such as a tutoring center, a dining facility, community spaces, and study areas" contains a litany of constraints that are not required to meet the objectives of Sophomore Success, even if they were valid. The litany of constraints only serves to thwart CEQA by forcing the project onto the undeveloped canyon site through unneeded micro-specification. SDSU can easily develop amenities without further dormitories. While SDSU may lust to develop a West Campus and additional revenue producing buildings, it is not necessary, nor does SDSU provide any objective facts to support a West Campus. Rather, SDSU makes assertions that are simply biased toward using an undeveloped, pristine canyon. This objective is developed to bias results of site selection away from any site

I107-6

other than the canyon site. This objective cannot be relied upon in CEQA, because it essentially makes choices, such as the already EIR CERTIFIED demolition/rebuild of Maya/Olmeca inconsistent with SDSU's desired plan, not any objective requirements. The demo/rebuild action was already certified by the Board of Trustees, and therefore, its exclusion is prima facie evidence of SDSU gaming the site selection process. This object is arbitrary, developed to bias selection, and must be rejected and not used as an objective criteria.

I107-6
Cont.

MEN-COMMENT-2.7

SDSU's Project Goals and Objectives are Arbitrary and Unsubstantiated and Contrary to the Legislative Intent of CEQA (Section 2)

SDSU's objective #2 to "Alleviate isolation of Chapultepec Hall and respond to the deficit in student amenities in the proposed project vicinity, as reported by the residents and staff of Chapultepec Hall" is subjective, forces development to the undeveloped canyon, and asserts the only path to development of amenities (e.g., Starbucks) is to build additional dorms on the west campus. The population of Chapultepec Hall is either larger than, or approximately the same size as over 200 cities in California. It is completely unsubstantiated for SDSU to assert that Chapultepec, a dorm the size of a city, is isolated when it's a 5 minute walk from the centroid of SDSU campus. Furthermore, if it lacks amenities, that is purely the fault of SDSU's Planning function, dating back to the 1980s. Amenities can be developed without such environmentally damaging activities as West Campus dormitory construction. Last, SDSU has very selective use of surveys, if it asserts that students and faculty in "Chappy" ask for amenities and that for some reason SDSU should give weight to those student desires. SDSU completely IGNORES surveys of students that also state that only 33% of all freshman and 22% of all SDSU sophomores would choose to live on-campus based on page 7.10 of SDSU's own Student Housing Strategic Plan. That 33% and 22% interest in on-campus living is the highest estimate possible, since the question was stated in a very biased way, asking "if all your housing preferences were met" and followed a question on the survey where students essentially laid out their PERFECT living situation. SDSU cannot rely selectively on survey results that it likes, yet ignore those it are INCONVENIENTLY TRUE. Students DO NOT want to live on campus, yet SDSU ignores that survey result. SDSU conveniently relies on some unsubstantiated alleged survey for students seeking more amenities however. SDSU's Project Goal #2 stated above must be disregarded as arbitrary, not representative of even California standards of isolation as it is larger than, or the size of hundreds of cities, and as the result of using hand selected, non-provided survey results while ignoring their own studies that few SDSU sophomores seek to be COERCED into living on campus by SDSU.

I107-7

MEN-COMMENT-2.8

SDSU's Project Goals and Objectives are Arbitrary and Unsubstantiated and Contrary to the Legislative Intent of CEQA (Section 2)

SDSU's objective #3 to "Provide additional on-campus housing for freshman students, thereby making existing housing that is more appropriate for sophomores, available to sophomores, in furtherance of the Sophomore Success Program" relies on the unsubstantiated and disproven assumption that SDSU sophomores will benefit from living on campus. Current research demonstrates that on-campus housing is not a significant factor on student or sophomore success. This misrepresentation by SDSU has created a EIR with a falsified fact basis overall.

I107-8

Specifically, the NSSE report and summary presentation (<http://nsse.indiana.edu/pdf/presentations/2015/NSSE%20ACUHC-I%20Presentation.pdf>) The Relationship of On-Campus Living with Student Engagement from 2015 makes the following findings: 1) On most engagement measures, there were few differences between students living on campus and those within walking distance, and 2) Where differences existed, they were generally with those farther than walking distance. As a result, SDSU has far overstated the benefits of students living on campus, and further, the proportion of students that would benefit at all. Furthermore, 2016 follow-up research finds that there are NO BENEFITS to living on campus due to changes over the past decades, with the following statement "Changing Landscape" has led to "Student Residence has an INCONSEQUENTIAL effect." (http://nsse.indiana.edu/pdf/presentations/2016/ACPA_2016_Graham_et_al_paper.pdf) Consequently, the work by Indiana University with its current and long term, longitudinal research demonstrates that there are INCONSEQUENTIAL benefits to students from living on campus. SDSU's Project Goal #3 stated above must be disregarded as arbitrary, since it is based on the factually discredited SDSU Sophomore Success Program.

I107-8
Cont.

MEN-COMMENT-2.9

SDSU's Project Goals and Objectives are Arbitrary and Unsubstantiated and Contrary to the Legislative Intent of CEQA (Section 2)

SDSU's objective #4 is to "Provide food and convenience services in the vicinity of the proposed project for students housed both in existing on-campus housing and to be housed in the new housing." SDSU's Project Goal #4 stated above must be disregarded as arbitrary, since it presupposes the outcome of the EIR to place housing in the West Campus. This is prima facie evidence that SDSU gamed the outcome of its site selection to select this west campus site. Otherwise, it could not have made a "new housing" statement a priori. Further, there is no substantiation of the need to build additional "new housing" in order to alieve any perceived shortfall of food and conveniences services in the vicinity of Chappy. That can be accomplished without building more housing, and by presupposing the outcome as an objective, SDSU has biased, and therefore invalidated its EIR.

I107-9

MEN-COMMENT-2.10

SDSU's Project Goals and Objectives are Arbitrary and Unsubstantiated and Contrary to the Legislative Intent of CEQA (Section 2)

SDSU's objective #5 is to "Increase on-campus student housing options by providing housing for approximately 2,600 additional students in a distinct neighborhood, thereby reducing the demand for student housing in the adjacent off-campus neighborhoods." SDSU's Project Goal #5 stated above must be disregarded as arbitrary, since it presupposes the already factually discredited Sophomore Success Program that coerces SDSU sophomores to live on campus. The stated goal of 2,600 students is not necessary based on SDSU's own housing supply and demand balance of student housing. Page 1.4 of the SDSU Student Strategic Housing Plan shows that the supply and demand balance for student housing in 2016/17 is Demand=4919 and Supply=4477. This difference, approximately 500 students, does not justify SDSU's assertion of 2,600 additional students housing without careless and self-serving speculation. Again, SDSU has been caught ignoring INCONVENIENT TRUTHS of survey results when the results do not meet SDSU explicitly stated preferences to build more "revenue producing" buildings. This objective is

I107-10

therefore arbitrary, deceitful, and built on half-truths and errors in fact. This objective must be discarded.

↑ I107-10
Cont.

MEN-COMMENT-2.11

SDSUs Project Goals and Objectives are Arbitrary and Unsubstantiated and Contrary to the Legislative Intent of CEQA (Section 2)

SDSUs objective #6 is to "Take advantage of an existing undeveloped area on campus to construct housing on a site that does not require the temporary removal of much-needed existing beds from the existing inventory." SDSUs Project Goal #6 again is arbitrary, unsubstantiated and purely designed to force construction to a pristine, undeveloped canyon. The existing, undeveloped land will result in non-mitigatable significant impacts, and even though SDSU was fully aware of that fact, it chose to make it a REQUIREMENT of the project to build there. The requirement for UNDEVELOPED LAND further excludes DISTURBED LAND, and is a direct violation of CEQA and its legislative intent, since SDSU has provided must have criteria that maximize environmental damages. It is unimaginable that UNDEVELOPED land could ever be a requirement in California in an EIR over DISTURBED land. Further, in its 2011 CERTIFIED EIR for the 2007 Campus Master Plan, the demolition and rebuilding of the Olmeca/Maya Halls was planned without further environmental review. It is both astounding and highly disingenuous that SDSU Planning ignored the current Campus Master Plan and CERTIFIED 2011 EIR in favor of developing a project objective that by action of SDSU staff invalidated a public vote and EIR CERTIFICATION of the Board of Trustees. This objective is therefore arbitrary, deceitful, and ignores prior environmental analysis and certification of an EIR. This objective is arbitrary and solely designed to lead to construction in the canyon. The objective by design maximizes environmental damage and minimizes environmental protections. This objective must be discarded and SDSU must consider the certified EIR from the 2007 Campus Master Plan.

I107-11

MEN-COMMENT-2.12

SDSUs Project Goals and Objectives are Arbitrary and Unsubstantiated and Contrary to the Legislative Intent of CEQA (Section 2)

SDSUs objective #7 is to "Provide additional student housing in an area that has the capacity to accommodate a large number of student housing beds and associated amenities, where the land is owned by the university and unencumbered by other uses or existing structures that would need to be demolished." SDSUs Project Goal #7 again is arbitrary, unsubstantiated and purely designed to force construction to a pristine, undeveloped canyon. The objective flaunts the Board of Trustees certification of the EIR for the 2007 Master Plan. The objective ignores the SDSU ability to condemn land. The objective ignores all DISTURBED land by design, maximizes environmental damage, minimizes the ability for environmental protections, and therefore ignores CEQA in both letter and intent. Objective #7 is purely developed to force construction in pristine, undeveloped land that will result in non-mitigatable significant impacts, and even though SDSU was fully aware of that fact, it chose to make it a REQUIREMENT of the project to build there. Further, in its 2011 CERTIFIED EIR for the 2007 Campus Master Plan, the demolition and rebuilding of the Olmeca/Maya Halls was planned without further environmental review. It is both astounding and highly disingenuous that SDSU Planning ignored the current Campus Master Plan and CERTIFIED EIR in favor of developing a project objective that by action of rule invalidated a public vote and EIR CERTIFICATION of the Board of Trustees.

I107-12

This objective is therefore arbitrary, deceitful, and ignores prior environmental analysis and certification of an EIR. This objective is arbitrary and solely designed to lead to construction in the canyon. This objective must be discarded because it is designed inconsistent with CEQA.

I107-12
Cont.

MEN-COMMENT-2.13

SDSU's Project Goals and Objectives are Arbitrary and Unsubstantiated and Contrary to the Legislative Intent of CEQA (Section 2)

SDSU's objective #8 is to "Reduce regional traffic and increase the walkability of the SDSU campus by providing on campus housing that includes a variety of student-friendly amenities and that is situated within a walkable distance from the academic, athletic, and social centers of campus." SDSU's Project Goal #8 again is arbitrary, unsubstantiated and purely designed to force construction to a pristine, undeveloped canyon. Furthermore, the proposed Phase I, II, III plan INCREASES traffic to campus and results in NON-MITIGATABLE SIGNIFICANT IMPACTS on traffic. Therefore it is an objective that cannot be met. Further, objective #8 reiterates that SDSU believes that 2800 is an EXACT size for a student area and amenities. According to the US News database of Colleges and Universities (about 1300 rated universities of the approximately 10,000 accredited US schools) Chapultepec Hall's existing student base of 830 is LARGER than the 260 smallest colleges and universities on the US News list, ranking in the 20th percentile of universities BY SIZE. Therefore, just the existing population of Chapultepec is a COMMUNITY larger than 260 colleges and universities! At a size of 2,800, the West Campus would exceed the size of 819 colleges and universities, and the dorms alone would be in the upper 40% by size of ALL COLLEGES AND UNIVERSITIES! Clearly SDSU Planning has a misguided sense of size when it refers to COMMUNITY.

I107-13

There is no foundation provided, nor can there be any foundation when SDSU asserts its dorms should be bigger than 50% of ALL UNIVERSITIES by headcount. SDSU has set an arbitrary value. SDSU Planning ignored many facets of the current Campus Master Plan and CERTIFIED EIR in favor of developing a project objective with arbitrary, reverse-engineered objectives to implement a project that SDSU has sought since its 2010 West Campus plan that was withheld from the Cumulative Impacts analysis of the 2011 EIR Certification. This objective is arbitrary and solely designed to lead to construction in the canyon.

This objective must be discarded because it is developed to exclude all sites other than development on West Campus and primarily in the undeveloped canyon based on the 2010 study of the West Campus showing extreme development.

MEN-COMMENT-2.14

Sophomore Live-on Requirement is Not Realistic

In SDSU's December 2015 Second-Year Live-on Requirement Executive Briefing (provided by Public Records Act), SDSU refers to the "REALISTIC" NO Sophomore Live-on Requirement scenario. Clearly SDSU has deep and significant doubts about its own proposed actions of COERCING sophomores to live on campus if it refers to the No Sophomore Live-on Requirement as the REALISTIC scenario. If SDSU views its own assumptions as not realistic, they should be rejected in the EIR and EIR should not be certified.

I107-14

MEN-COMMENT-2.15

SDSU Conflict of Interest in Project Site Selection

SDSU owns a number of properties on 55th street, either directly or via controlled affiliates such as Aztec Shops. As a result, SDSU and affiliates have a conflict of interest between its profit motive and its fiduciary responsibility to the State, the environment and CEQA. For example, at a recent Aztec Shops board meeting, it was revealed that System-Wide Revenue Bond-Financed Apartment Properties performance from 2012-2016 was a cash cow. The properties, which include Albert's College Apartments, College West Apartments, Piedra del Sol and Fraternity Row Apartments, consistently met or exceeded projections with returns on investment at 9-10%. Further, Aztec Shops reported financial results are tracking ahead of budget through Period 6. Rental income was higher than budget based on occupancy at Albert's College Apartments and Fraternity Row. The depreciation expense recorded year-to-date was \$1,415,239. Contribution over budget is expected to hold through year-end.

SDSU has become a real estate investor and speculator, and has lost its primary mission to educate. SDSU is manipulating where students live in order to increase revenues through Aztec Shops, as demonstrated by additional information from the Aztec Shops board which reported apartment occupancy is strong with Albert's College Apartments at 98%. Aztec Shops partnership with SDSU's Office of Housing Administration resulted in 1,000 students living in Aztec Shops apartments. SDSU may be actively manipulating the rental market to funnel students into Aztec Shops housing to maximize ROI of SDSU investments.

As a result, SDSU is too busy watching financial bottom lines of its real estate portfolio to provide CEQA quality assessments of what disturbed land can be appropriately used for dorm construction. Given that it is receiving 10% ROI, SDSU will continue to bias all decisions that threaten its investment portfolio, despite environmental impacts.

A third party should be required to step in place of SDSU and SDSU Planning in order develop alternatives, develop scoring, score, and to recommend final decisions to the Board of Trustees. SDSU is blinded by the ROI of its portfolio and is protecting its investments, not the environment. The EIR should not be certified if SDSU remains involved in this conflict of interest.

MEN-COMMENT-2.16

Isolation Impacts of Villa Alvarado are More Significant than Chapultepec

SDSU's Villa Alvarado facility is both materially isolated from the rest of student housing, and at a substantial grade lower than the rest of housing. Villa Alvarado is much smaller than Chapultepec Hall. Chapultepec is larger than several hundred California cities, and as a result, it merely needs private food service to be viable. Further, Chapultepec is approximately 0.6 miles from Love Library, the centroid of campus, and Villa Alvarado is so isolated that it largely requires a car for transportation. As a result, construction of any student housing by Chapultepec will leave Villa Alvarado more isolated and will result in significant impacts. The project must be built by Villa Alvarado to remedy its significant isolation along with transportation to campus from Villa Alvarado, if reduction in isolation is a key objective. SDSU's evaluation of alternative sites is biased and must be rejected.

1107-15

1107-16

MEN-COMMENT-2.17

SDSU's Plan Represents Blockbuster Video, Not Redbox and Cannot Justify Any Environmental Damage - None that is Significant or even Less than Significant - NONE

SDSU is rapidly approaching extinction as a major university with its current plan to build more brick and mortar dorms. The 2000s and 2010s and beyond are a world where Social Media is community – not dorms. Online classes are becoming more commonplace at all universities and in the CSU system. Online classes are becoming increasingly common at SDSU. Building dorms is a commitment of 30 years or more in financing. But moreover, building dorms is an irreversible destruction of the environment unless build exclusively on brownfield or disturbed land. Any plan by SDSU to proceed with anything other than the No Project Alternative, or the Reduced Density Alternative is a focus on the past, not on future and no EIR should be allowed to be certified that commits any environmental damage of any kind.

I107-17

MEN-COMMENT-2.17

Isolation Impacts of University Towers are More Significant than Chapultepec (especially with respect to use of UT Parking lot option)

SDSU's University Towers facility is materially isolated from the rest of student housing, at a mean average distance from the center of campus approximately the same as Chapultepec Hall. University Towers (UT) is approximately 2/3 the size of Chapultepec, so as a result, if there is a lack of community at Chapultepec, there is a LARGER lack of community at UT. UT has a food service, therefore, Chapultepec at its current size, at 1.5 times the size of UT, is a cost-effective candidate for amenities. As part of SDSU Planning's continued bias against all sites other than Chapultepec to meet the needs of freshman to support sophomores, SDSU refuses to recognize the brownfield nature of UT's parking lot, the isolation from campus being equal to that of Chapultepec, and the smaller student base than Chapultepec, thereby leading to increased lack of community that is greater than Chapultepec. SDSU's evaluation of alternative sites is biased and must be rejected.

I107-18

MEN-COMMENT-2.18

SDSU's Project Goals and Objectives are Unnecessarily Restrictive and Exceed the Reasonable Purpose and Need of the Project and Must be Relaxed to Preserve the Environment (Section 2)

SDSU's Goals and Objectives, when taken together, are like shopping for an Automobile and requiring the Vehicle Identification Number match a pre-specified number. By design, SDSU seeks to specify a set of Goals and Objectives that are so restrictive there is no room for compromise and then the environment is damaged. SDSU must relax its Goals and Objectives to the least restrictive to meet the overall objective of 2600 students, without caveats such as "use undeveloped land" or "west campus ... like east campus", all of which clearly demonstrate their bias.

I107-19

MEN-COMMENT-2.19

SDSU Must Relax its Time Schedule For Completion (Section 2)

The record clearly shows that SDSU has had a plan to develop West Campus prior to Sophomore Success. Further, SDSU has had this particular plan since 2010 with an update in 2013. SDSU has elected to make this a time crisis by concealing its plans and filing its EIR with limited time

I107-20

Responses to Comments - Individuals

available for construction. SDSU has failed in planning and SDSU has failed the environment by creating a crisis. The environment does not have to pay the tab for SDSU's failure. Brownfield, demolition/rebuild, prior approved projects like Maya/Olmeca redevelopment, condemnation of adjoining commercial apartment land, and other more environmentally responsible paths must have the time needed for completion. The environment does not have to pay for SDSU's failure in planning now, or its apparently failure 30 years ago in developing what it now considers to be an isolated, amenity defective housing project.

1107-20
Cont.

**Mark Nelson Comments on 4/21/17 Issued EIR on
SDSU New Student Housing Project
Environmental Impact Report
Section 3 – Cumulative Impacts**

MEN-COMMENT-3.1

Cumulative Impacts Contributions from SDSU Projects are Incomplete and Must be Reassessed (Section 3)

SDSU has a history of failure to disclose reasonably foreseeable projects. As demonstrated in MEN-COMMENT-2.4, a full design for the West Campus dorm expansion Phases I, II, and III was prepared and utilized in the 2013 West Campus Master Plan as well. Despite the reasonably foreseeable nature of this project, SDSU failed to disclose it as a Cumulative Impact in either its EIR for the 2007 Campus Master Plan (certified 5/2011) or the EIR Addendum for Plaza Linda Verde (certified 5/2011). As a result, the community had no knowledge of this project, and if the CEQA EIR certification for the 2007 Master Plan is called into question.

That situation appears to be repeating itself. SDSU projects in Section 3 Cumulative Impacts does not appear to include a new housing building with approximately 500 beds to be built at an estimated cost \$93.6M. This plan can be found on Page 4 of SDSU's own Second Year Live-On Requirement Executive Briefing from December 15, 2015. SDSU cannot continue its apparent falsification of EIR Cumulative Impacts by failing to disclose reasonably foreseeable projects. The current EIR must be restated, and the 2011 EIR for the 2007 Master Plan should be reopened and corrected.

MEN-COMMENT-3.2

The Current DEIR and the Proposed Project Represent Piecemealing under CEQA (Section 3)

The current West Campus Residence proposal was reasonably foreseeable (the appropriate standard) and was withheld from Cumulative Impacts of prior EIRs and environmental analyses. It is piecemealing and should be denied.

I107-21

I107-22

**Mark Nelson Comments on 4/21/17 Issued EIR on
SDSU New Student Housing Project
Environmental Impact Report
Section 4 – Environmental Analysis**

MEN-COMMENT-4.1

Significant Energy Impact – Electricity

The EIR assigns less than significant assessments to electricity, including any impacts of related outage of the Aliso Canyon natural gas storage that feeds electricity, yet it never defines the metrics that it will use. As a result, any assignment of significance is invalid.

I107-23

MEN-COMMENT-4.2

Significant Energy Impacts – Natural Gas

The EIR assigns less than significant assessments to natural gas, including any impacts of permanent outage of the Aliso Canyon natural gas storage, yet it never defines the metrics that it will use. As a result, any assignment of significance is invalid.

I107-24

MEN-COMMENT-4.3

Significant Energy Impacts – Gasoline

The EIR assigns less than significant assessments to gasoline including interactions with SB350 and CARB directives to reduce overall GHGs to 80% below 1990 levels, yet it never defines the metrics that it will use. As a result, any assignment of significance is invalid.

I107-25

MEN-COMMENT-4.4

Significant Impacts – Green House Gasses

The EIR assigns less than significant assessments to green house gasses including interactions with SB350 and CARB directives to reduce overall GHGs to 80% below 1990 levels, yet it never defines the metrics that it will use. Furthermore, it fails to assess the significance of upstream GHGs from cement and petroleum processing, two areas of heavy use in construction. As a result, any assignment of significance is invalid.

I107-26

MEN-COMMENT-4.5

Significant Energy Impacts – Electricity (Section 4.5)

Per CSU press release, <http://www.csudhnews.com/2015/02/sena-co-signing/>, SDSU is not a customer of SDG&E, and instead is a direct access customer purchasing electricity and gas services from the open market. This appears to be a material error in the EIR. As a result, Section 4.5 Energy appears to be materially flawed in its discussion of energy, and consequently, the EIR is materially flawed in its determination of significance on this issue. Specific, named electricity generation sources need to be cited in order to understand the significance of any impacts. Absent an accurate and thorough analysis of electricity sources by fuel, plant and transmission route, SDSU impacts must be found to be significant.

I107-27

MEN-COMMENT-4.6

Significant Energy Impacts – Electricity (Section 4.5)

I107-28

Per CSU press release, <http://www.csudhnews.com/2015/02/sena-co-signing/>, SDSU is not a customer of SDG&E, and instead is a direct access customer purchasing electricity and gas services from the open market. This appears to be a material error in the EIR. Even if SDSU is a customer of SDG&E, SDSU provides no foundation for its assertion that its impact on the electric system is not significant, especially if that system is limited to a small SDG&E cogeneration facility. As a result Section 4.5 Energy may still be materially flawed. In the absence of SDSU providing objective standards for significance for electricity impacts, SDSU impacts must be found to be significant.

I107-28
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MEN-COMMENT-4.7

Significant Energy Impacts – Electricity (Section 4.5)

Per CSU press release, <http://www.csudhnews.com/2015/02/sena-co-signing/>, SDSU is not a customer of SDG&E, and instead is a direct access customer purchasing electricity and gas services from the open market. This appears to be a material error in the EIR. Notwithstanding its electricity provider, SDSU's electricity supply and requirements for natural gas and related ramping service fail to have been evaluated with respect to the now failing natural gas storage facility, Aliso Canyon. Aliso Canyon's leak and likely shutdown will significantly limit natural gas available to non-core customers, such as SDSU and electricity providers. Absent an analysis of the Project on Aliso Canyon's impacts on the electric system, SDSU impacts must be found to be significant.

I107-29

MEN-COMMENT-4.8

Significant Energy Impacts – Natural gas (Section 4.5)

Per CSU press release, <http://www.csudhnews.com/2015/02/sena-co-signing/>, SDSU is not a customer of SDG&E, and instead is a direct access customer purchasing electricity and gas services from the open market. This appears to be a material error in the EIR. As a result, Section 4.5 Energy appears to be materially flawed in its discussion of energy, and consequently, the EIR is materially flawed in its determination of significance on this issue. Specific, named, specific natural gas sources need to be cited in order to understand the significance of any impacts. Absent an accurate and thorough analysis of natural gas impacts and distribution routes, SDSU impacts must be found to be significant.

I107-30

MEN-COMMENT-4.9

Potentially Significant Energy Impacts – Natural Gas (Section 4.5)

Per CSU press release, <http://www.csudhnews.com/2015/02/sena-co-signing/>, SDSU is not a customer of SDG&E, and instead is a direct access customer purchasing electricity and gas services from the open market. This appears to be a material error in the EIR. Even if SDSU is a customer of SDG&E, SDSU provides no foundation for its assertion that its impact on the gas system is not significant, especially if that system is limited to a small SDG&E cogeneration facility with limited sources of natural gas. As a result Section 4.5 Energy may still be materially flawed. In the absence of SDSU providing objective standards for significance for natural gas impacts, SDSU impacts must be found to be significant.

I107-31

MEN-COMMENT-4.10

Significant Energy Impacts – Natural Gas (Section 4.5)

I107-32

Per CSU press release, <http://www.csudhnews.com/2015/02/sena-co-signing/>, SDSU is not a customer of SDG&E, and instead is a direct access customer purchasing electricity and gas services from the open market. This appears to be a material error in the EIR. Notwithstanding its natural gas provider, SDSU's natural gas supply and requirements for natural gas and related ramping service fail to have been evaluated with respect to the now failing natural gas storage facility, Aliso Canyon. Aliso Canyon's leak and likely shutdown will significantly limit natural gas available to non-core customers, such as SDSU. Absent an analysis of the Project on Aliso Canyon's impacts on SDSU's natural gas supply, SDSU impacts must be found to be significant.

I107-32
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MEN-COMMENT-4.11

Significant Impacts due to Geotechnical Hazards (Section 4.6)

The La Nacion fault that is 2000 feet from the proposed project has a 6.7M maximum risk, not "magnitude 6.2 to 6.6" as stated in the Geotech appendix. This is per the San Diego general plan (<https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/generalplan/seismicafetyelement.pdf>). Because the La Nacion fault system is so close to the proposed project, and because the scale is logarithmic, this error can be substantial in design. Construction of a project 2000 feet from a 6.7M capable fault will require substantial environmental damage to secure the structures. The EIR does not state how much excavation is required, and this is key to understanding the environmental damage and significance. SDSU cannot simply avoid the issue without continuing to carry "potential significant impacts." SDSU must assign a significant impact to this hazard.

I107-33

MEN-COMMENT-4.12

Significant Impacts due to Geotechnical Hazards (Section 4.6)

The La Nacion fault that is 2000 feet from the proposed project has a 6.7M maximum risk, not "magnitude 6.2 to 6.6" as stated in the Geotech appendix. This is per the San Diego general plan (<https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/generalplan/seismicafetyelement.pdf>). Because the La Nacion fault system is so close to the proposed project, and because the scale is logarithmic, this error can be substantial in design. Chapultepec Hall was designed in the 1980s under a lower set of perceived seismic risks. Thus, even if the proposed project uses appropriate governing faults with updated codes and corrected levels of impacts, the material risk of the existing, under designed and underbuilt Chapultepec collapsing during an event into the new construction causing large potential damage and injury is unanalyzed. Further, SDSU VP Robert Schultz has asserted that SDSU cannot receive funding to update existing buildings, and as a result must build new, revenue-producing buildings, further supporting that this is a significant and mitigatable impact. (<http://www.thedailyaztec.com/82227/news/love-library-not-up-to-code-for-earthquakes/>)

I107-34

As a result, SDSU must find geotechnical hazards are significant impacts without mitigation if the CSU system will not retrofit Chapultepec to the same seismic PRA standard as any new dorms.

MEN-COMMENT-4.13

Significant Green House Gas Impacts (Section 4.7)

Per CSU press release, <http://www.csudhnews.com/2015/02/sena-co-signing/>, SDSU is not a customer of SDG&E, and instead is a direct access customer purchasing electricity and gas services from the open market. This appears to be a material EIR flaw. As a result, Section 4.7

I107-35

Green House Gas Emissions appears to be materially flawed in its discussion of energy and the derivative green house gases, and consequently, the EIR is materially flawed in its determination of significance on this issue. Specific, named electricity generation sources need to be cited in order to understand the significance of any impacts. Absent such an analysis, SDSU's Green House Gas impacts must be found to be significant.

I107-35
Cont.

MEN-COMMENT-4.14

Significant Green House Gas Impacts (Section 4.7)

Per CSU press release, <http://www.csudhnews.com/2015/02/sena-co-signing/>, SDSU is not a customer of SDG&E, and instead is a direct access customer purchasing electricity and gas services from the open market. This appears to be a material EIR flaw. As a result, Section 4.7 Green House Gas Emissions appears to be materially flawed in its discussion of energy and the derivative green house gases, and consequently, the EIR is materially flawed in its determination of significance on this issue. SDSU provides no objective data or measurement set to evaluate emissions level significance. Absent such an analysis demonstrating specifically how emissions levels map to significance levels, SDSU's Green House Gas impacts must be found to be significant.

I107-36

MEN-COMMENT-4.15

Significant Green House Gas Impacts (Section 4.7)

Green House Gas Emissions considers only a wide geographic area for analysis of significance. Emissions modeling must take into account the areas immediately adjacent to the project as well. This analysis was not completed (or at least not reported) and consequently the EIR is materially flawed in its determination of significance on this issue. Absent such an analysis, SDSU's Green House Gas impacts must be found to be significant.

I107-37

Reference - <https://oag.ca.gov/environment/ceqa/measures> - Under the California Environmental Quality Act (CEQA), where a project will have significant environmental impacts, the agency undertaking or permitting that project must impose all feasible mitigation.

MEN-COMMENT-4.15

Significant Green House Gas Impacts (Section 4.7)

SB 32 and other legislation and executive orders provide that California must reduce green house gas (GHG) emissions by 40% by 2030 and by 80% by 2050. As demonstrated in both Section 4.5 and Section 4.7, the SDSU "project" will raise green house gas emissions and has no mechanisms in place to reduce GHGs to comply with 40% in 2030 and 80% in 2050 required reductions. As a result, any finding of less than significant impacts results in "piecemealing." SDSU's new project and new, incremental emissions, taken in conjunction with all other known projects currently in CEQA EIR process across the state, will be significant. SDSU cannot remove itself from the overall environment to declare lowered significance, that is the definition of piecemealing, though applied more broadly. Furthermore, a finding of significance requires SDSU to use all feasible measures to mitigate, including in this case, carbon free energy (both electricity and renewable natural gas) and carbon capture and storage on natural gas fired generation. Consequently, the EIR is materially flawed in its determination of significance on this issue and mitigations are required under CEQA. SDSU must provide, and evaluate green house gas impacts using object measures of changes in green house gasses.

I107-38

MEN-COMMENT-4.16

Significant Green House Gas Impacts (Section 4.7)

Assembly Bill 32 recognizes the disproportionate impacts climate change will have on disadvantaged and low-income communities. Nowhere in the EIR does SDSU evaluate the impacts of its green house gasses on disadvantaged and low-income communities. SDSU must provide, and evaluate green house gas impacts on disadvantaged and low income communities using object measures of changes in green house gasses.

I107-39

MEN-COMMENT-4.16

Significant Impacts due to Hazard intensification (Section 4.8)

SDSU cannot state that their CEQA obligation for analysis has been met in Section 4.8. Nor can it state that its obligation to mitigate has been met. Based on the VERY HIGH FIRE HAZARD rating from CalFire (<http://www.ready.sandiego.org/wildfire-hazard-map/>) in the canyon and the further evidence that people are a 95% cause of fire, (<http://news.nationalgeographic.com/news/2014/05/140517-san-marcos-wildfires-california-weather/>) SDSU should NOT build Phase 2 or 3 in the canyon. West campus housing consistent with the existing proposal should only be built concurrent with Phase 1 in the Phase 1 area or near proximity. The finding for Phases II and Phases III must be significant impact with no possible mitigation.

I107-40

MEN-COMMENT-4.17

Significant Impacts due to Hazard intensification (Section 4.8)

All new residence halls should have the following fire hazard mitigations: 1) 100% non-operable windows to prevent any fire hazards from entering the canyon from the dorms or associated buildings, 2) ring fencing to prevent any canyon interaction, 3) 24/7/365 monitoring of the interface of SDSU and the canyon, 4) no exit from buildings to the canyon, 5) year round smoking cessation classes. Fire hazard increases, beyond the existing CalFire VERY HIGH FIRE Hazard rating, from concentrated populations of young adults without mitigations are not acceptable anywhere and would yield significant impacts.

I107-41

MEN-COMMENT-4.18

Significant Impacts due to Higher On-campus Sexual Assault/Rape Levels (Section 4.13)

In SDSU's December 2015 Second-Year Live-on Requirement Executive Briefing (provided by Public Records Act), SDSU asserts that there will be a "Long Term Decrease in Inappropriate Behavior in the Local Community, i.e. Sexual Assault" As with most SDSU assertions, there is no backup for such a statement. However, the EIR does not analyze this impact, and further, simple statistics dictate that SDSU's new housing will have HIGHER LEVELS of Rape/Sexual Assault, not lower, putting students who are COERCED to live on campus as a higher level of risk for being raped/sexual assaulted.

I107-42

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.

I107-42
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MEN-COMMENT-4.19

Significant Impacts in Aesthetics (Section 4.1)

The EIR does not have any objective discussion of the specific characteristics of what is deemed significant. This is likely so as to avoid responsibility for the aesthetic impacts. As a result, the EIR is materially incomplete and must not be certified.

I107-43

MEN-COMMENT-4.20

Significant Impacts in Aesthetics (Section 4.1)

The existing Chapultepec Hall and the proposed Phase I, II, and III are of extremely different styles. As a result, they are a poor match and the new buildings create a significant impact in architectural style. This is a significant impact.

I107-44

MEN-COMMENT-4.21

Significant Impacts in Aesthetics (Section 4.1)

Phase I is materially different than the existing Chapultepec Hall, and as a result, Phase I has significant impacts unless it is raised to a height of at least 10 stories. The materially different architectural style is also a significant impact that needs to be mitigated to someone more consistent with Chapultepec. Phase I has significant impacts.

I107-45

MEN-COMMENT-4.22

Significant Impacts in Aesthetics (Section 4.1)

Phase II is out of scale and architecture with both Chapultepec and the existing community. At 14 stories (approximately 150 feet) and being located above the homes in the neighborhood at base elevation, Phase II is likely 10-fold higher than much of the surrounding community. Taller portions of the project need to be east of Chapultepec in the Lot U/9 area that has been certified in 2011 as environmentally appropriate as a 10 story dorm. Phase II, if built at all, must be the scale of the surrounding community, which would limit it approximately 25 feet high maximum without significant impacts.

I107-46

MEN-COMMENT-4.22

Significant Impacts in Aesthetics (Section 4.1)

Phase III is out of scale with the community both in height and lot line incursion. Phase III will be on the lot line of the community, and at 11 stories (assume 120 feet) will be 10 fold higher than the surrounding community and approximately 50 feet from other structures. Given that SDSU has had plans for Phase I, II, and III for at least 4 years and as long as 7, and they it failed

I107-47

to disclose to the community, their actions are completely consistent with a proponent project that cannot be approved. The EIR must not be certified.

MEN-COMMENT-4.23

Significant Impacts in Noise (Section 4.11)

Unlike most CEQA/EIR activity for the expansion of an ongoing concern, there do not appear to be any noise readings taken from existing dorms at the distance that Phase I, II or III is proposed to be from noise receptors. The only analysis appears to be noise impact ON the project, not noise impacts BY the project during full 2700 student operation. As a result of this defect in the study, the noise impacts must be considered to be significant during ordinary operation of the project.

MEN-COMMENT-4.24

Significant Impacts in Noise (Section 4.11)

Due to the failure of the EIR to evaluate the ongoing noise using measurement, the following mitigations will be required: non-operable windows; noise dampening construction to reduce noise transfer from the project to external receptors; offsite noise reducing bunkering of all rotating machinery; development of all access roads internal to the project only; no opening doors, balconies or patios; and no access that would transmit any sound to the surrounding receptors. In the absence of all these concurrent mitigations, the project will have non-mitigatable significant impacts on the community receptors from sound.

MEN-COMMENT-4.25

Significant Impacts to Traffic and Defective Traffic Study (Section 4.14)

SDSU's traffic study is invalid, because SDSU has full knowledge of the stated living location of each student, and each student's class schedule. As a result, SDSU could easily model actual student trips, potential routes, and timing. Instead, SDSU chose to make assumptions and take shortcuts, presumptively to save money and shorten the accuracy and duration of the study. In the case of a shopping mall or other destination with only limited information about commuters, this may be appropriate. In the case of a university with such a richness and wealth of information, this assumption driven process invalidates the study. As a result all traffic impacts must be assumed to be significant, and many must be assumed to be non-mitigatable. Thus, the EIR must not be certified.

MEN-COMMENT-4.26

Significant Impacts to Undeveloped Hillside, Runoff, and Water Filtration (Section 4.6, 4.13, 8)

SDSU's EIR acknowledges the increased loss of soil and erosion in the preferred project when compared to the other projects. As a result, development of the project using disturbed space, such as the sites previously proposed and EIR certified by the CSU Trustees is known to be less environmentally damaging. Those sites include Lot U/9 east of Chapultepec, and the demolition/reconstruction of Olmeca/Maya which was certified in the EIR of the 2007 Campus Master Plan. Olmeca/Maya was discarded by SDSU Planning without discussion or explanation for disregarding the existing Campus Plan.

MEN-COMMENT-4.27

Failure to Disclose Speculative Housing Growth Estimates (Section 2.6)

↑ I107-47
Cont.

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I107-49

I107-50

I107-51

↓ I107-52

SDSU acknowledges in Section 6 that it is “overbuilding” the preferred project based on speculation about future student occupancy (6-19). As a result, SDSU is planning to destroy natural resources and create non-mitigatable significant impacts based on speculation. SDSU’s own forecasts in its Student Housing Strategic Plan show little to no new need for housing post 2017 (page 1.4). As a result, any construction is both speculative and explicitly against SDSU’s own internal forecasts. The Preferred Project is too large, unjustified, and the EIR should not be certified.

I107-52
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MEN-COMMENT-4.28

Potential Non-Mitigatable Significant Impacts due to Valley Fever (Section 4.8)

Public Records Act requests demonstrate that SDSU has not contemplated nor tested for Valley Fever spores, nor other mold spores in the construction area. San Diego County is well known for Valley Fever during constructions, the movement of millions of pounds of soils for construction will expose workers and residents and future students to Valley Fever if it is in the soil. Health advocates have stated “Valley fever starts with the simple act of breathing. In about 100 cases every year nationally the fever kills. That’s more deaths than those caused by hantavirus, whooping cough, and salmonella poisoning combined, yet all of these conditions receive far more attention from public health officials.” (<https://www.centerforhealthjournalism.org/content/just-one-breath-valley-fever-cases-reach-epidemic-levels-harm-remains-hidden>). Additionally, Chapultepec was filled with mold, and there is no reason not to assume mold is in the soil surrounding it. As a result, the DEIR is incomplete and construction puts workers, residents, and students at health risk without mitigation ability.

I107-53

**Mark Nelson Comments on 4/21/17 Issued EIR on
SDSU New Student Housing Project
Environmental Impact Report
Section 6 – Alternatives**

MEN-COMMENT-6.1

SDSU's Development of Alternatives is Invalid – Improper Alternatives Evaluation (Section 6)

The EIR fails in that it failed to consider alternatives that were proposed and certified in the 2007 Master Plan EIR (certified 5/2011). As a result, the alternatives analysis and the EIR as fatally flawed. Olmeca and Maya Hall demolition and reconstruction have been evaluated and environmentally approved. Clearly this would continue the freshman community that resides in the single/double/triple rooms at Zura and Tenochca with approximately 1250 freshman style beds (676 and 580, respectively). SDSU and CSU Trustees have already approved in 2011 replacing Olmeca and Maya with two 10-story, 800 bed towers with an increase in beds of approximately 1200. This will provide significant community for freshman in the 4 halls as an improvement over today's configuration (total beds available will be approximately 2800), provide new facilities, and increase utilization (and reduce per student cost) of joint facilities on the east side residence campus. This was all reviewed, approved, and certified as part of the 2007 Campus Master Plan.

I107-54

SDSU's 2013 plan for the west residence halls contained a PREFERRED PLAN of 1398 beds on Lot U/9 in Phase I. SDSU's 2013 plan also had a higher density option with 1430 beds on the same site, Lot U/9. The existing Chapultepec Hall offers 830 beds. The combination of preferred or high density would result in over 2200 beds at the west campus, providing significant community, new facilities, and cost-effective utilization of facilities. A smaller, 800 bed use of Lot U/9 was certified in the 2007 Campus Master plan, so that has been accepted by Trustees as adequate and is still the only certified master plan. SDSU apparently attempted to conceal previously certified options to mislead the public and Trustees. As a result, SDSU's CEQA-mandated alternatives analysis is invalid.

MEN-COMMENT-6.2

SDSU's Development of Alternatives is Invalid – Improper Site Evaluation Factors (Section 6)

If SDSU persists in arguing that additional "community" is required, all SDSU will be doing is admitting that Chapultepec was an 830 bed, mold-ridden error in judgement and that campus should have been expanded on the east side all along. SDSU through its own poor planning and subsequent development of Chapultepec has created its perceived need for "services" and "community." There is no rational expectation in CEQA that errors in judgement such as SDSU's initial development of Chapultepec should then justify the environmental carnage proposed in Phase II and Phase III with resulting non-mitigatable significant impacts. It is unthinkable to create environmental damage to correct poor judgement. As a result, SDSU's site evaluation factors of "Community" and "Service" are invalid and SDSU's CEQA-mandated alternatives analysis is invalid.

I107-55

MEN-COMMENT-6.3

SDSU's Development of Alternatives is Invalid – Improper Site Alternatives Included (Section 6)

I107-56

SDSU has a certified EIR associated with its 2007 Campus Master Plan. That master plan certified the demolition and reuse of Maya and Olmeca Halls. This increased beds for freshman located in the East Campus community in these units from approximately 400 to 1600. Even though these sites were certified in an EIR, they were not included in site alternative. As a result, SDSU's CEQA-mandated alternatives analysis is invalid.

I107-56
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MEN-COMMENT-6.4

SDSU Erroneously Asserts Less Than Significant Project Impacts for Shading and Shadow, Light Pollution, and Daytime and Nighttime Views.

SDSU asserts "Under the proposed project, impacts to shading and shadow, and day and nighttime views would be less than significant." This is an error in fact. SDSU has no basis in fact for its assessment of significance, and has created its standards from whole cloth. Further, SDSU has not computed the lost energy from solar PV panels that are eclipsed by the construction, nor has it computed the GHGs that SDSU must mitigate as part of its shading. SDSU has made similar material errors in its daytime and nighttime view assessment, as well as, light pollution. The appropriate finding is that the impacts are significant and can be mitigated. The buildings must be not built, built low enough to have no incremental impact, and have no outdoor lighting. All surfaces must be non-reflective or light absorbing.

I107-57

MEN-COMMENT-6.5

SDSU Erroneously Asserts That the No Project Alternative and the Reduced Density Alternative Do Not Meet the Project Objectives

Both the No Project Alternative and the Reduced Density Alternative meet the project objectives of increasing Sophomore Success. The studies clearly show that living on campus has no impact on success, therefore, the need for student housing is an error. Thus, the No Project Alternative can meet the needs as SDSU puts into place all the programs that would be needed for the disadvantaged, low income, minority, and exempt off campus students. As a result, it will be much less environmentally damaging, and less costly, to avoid all construction and instead meet the needs of the sophomores directly, avoid building SDSU's desired student housing that SDSU has been secretly planning since 2010. The No Project Alternative is appropriate.

I107-58

The Reduced Density Alternative, or the 2013 planned high-rise by landLab and Carrier Johnson for 1400 student capacity in Lot U alternative both meet the project objectives, but create more environmental damage. Both plans will create traffic conditions and will require that Remington Road be gated at the CVE entrance.

MEN-COMMENT-6.6

All Appeals to and Use of the Goals and Objectives of the Sophomore Success Program are Invalid (Section 2.6)

SDSU frequently rejects alternatives because they fail to meet the goals and objectives of the Sophomore Success Program. As demonstrated in MEN-COMMENT-2.1, the foundation of the Sophomore Success Program as it relates to the need for new development of housing and destruction of the environment is invalid based on current NSSE research and subsequent studies. The Preferred Alternative must be rejected and all analysis must be corrected and expunged of reliance on the Sophomore Success Program.

I107-59

Responses to Comments - Individuals

MEN-COMMENT-6.7

Per California Public Records Act Replies, No CSUs or UCs Require Sophomores to Live on Campus

Aside from using outdated research in an attempt to justify its Sophomore Success Program, and SDSUs stated policy by VP Schulz to develop student funded, revenue producing construction instead of repair failing buildings - the simple fact is that SDSU is entering into a speculative activity, locking in 30+ year dorms, with 30 year bonds and debt, a corresponding 30 year requirement to COERCE students to live on campus and a permanent, irreversible destruction of biological and environmental resources. The move toward electronic communications and online classes further reduces the need for on-campus housing. The significant and non-mitigatable impacts of the Preferred Alternative are not offset by the speculative benefits and must be rejected. As a point of accuracy, my research shows that CSUMB does require sophomores more than 30 miles from campus to live on campus, generally due to the cost of housing and commute times beyond 30 miles.

I107-60

MEN-COMMENT-6.8

SDSUs Plan to Create Permanent, Significant Impacts to Correct SDSUs 1980s Error Siting an Isolated, Amenity-free, Mold-ridden Chapultepec Hall CANNOT be Allowed

Over and over throughout the draft EIR, SDSU whines that Chapultepec is isolated. SDSU whines that Chapultepec has few amenities. And early on in its existence, due to poor planning and construction, Chapultepec was apparently abandoned for mold remediation. SDSUs track record with Chapultepec is abysmal.

It is not as though foreign armies conquered 5400 Remington Road, built a dorm, and then retreated bequeathing it to SDSU. Rather, SDSU planned, designed, conducted an EIR, sought and gained certification from the Trustees, constructed, owned and operated Chapultepec Hall for over 25 years now. From reading SDSUs draft EIR, SDSU asserts that it has failed those students in Chapultepec Hall mightily. As the draft EIR describes the situation, SDSU has left those poor students for a quarter-century in utter isolation and foraging for food, without Panda Express, Subway or Starbucks. They have no community nor amenities to hear SDSU whine.

I107-61

During the past 25 years however, SDSU has elected to build many buildings on the west campus, none of which were housing to develop community. In the meantime SDSU consumed prime sites. In fact, SDSU planned and executed a reduction in community according to locals, when it demolished the dorms from the current site of the tennis courts. SDSU has also acquired hundreds, if not a thousand beds on 55th Street, and has also chosen not build community with its new found, tax-free debt investments by Aztec Shops. Plainly, SDSU Planning and Housing have both failed in their missions. SDSU now seeks to correct its failure by destroying the environment and creating non-mitigatable significant impacts. SDSU continues to fail in its mission. SDSU has ill defined community. SDSU has ill defined amenities. SDSU has ill defined the Preferred Alternative. The draft EIR cannot be certified to assuage prior failures on the SDSUs part. The environment deserves respect, and SDSU pays lip service to sustainability, but clearly only "talks the talk". SDSU is failing miserably to "walk the walk" as it lusts to build 11 and 14 story buildings in an undeveloped canyon while it ignores brown-field, disturbed sites in order to inflict maximum possible damage on the surrounding environment and generations to come.

Responses to Comments - Individuals

MEN-COMMENT-6.9

SDSU Materialy Misrepresents Consistency with City of San Diego General Plan (Section 6)

A cursory scan of the City of San Diego General Plan map and also the City of San Diego Available Sites map quickly shows that the undeveloped lot mandated in the SDSU selection criteria is not part of the City of San Diego General Plan for high density student housing. The General Plan map clearly shows the undeveloped canyon as OPEN SPACE, not INSTITUTIONAL. Further, it is also NOT SHOWN as even residential space. Thus, SDSU has materially misrepresented the project's consistency with the General Plan and must correct the error.



I107-62

Further research shows that SDSU controls infill and undeveloped residential land on 55th street, and that is a likely consistent use with the General Plan as shown on the Adequate site map.

City of San Diego Adequate Site Inventory includes land on 55th St
But NOT the SDSU Preferred Site.



I107-62
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MEN-COMMENT-6.10

SDSU Materialy Misrepresents its Lighting Policy – a Policy that could results in excessive light impacts on the environment, plants, animals and the community (Section 6)

SDSUs Lighting Policy provides no protections for excessive lighting outside the campus.

Impacts on local homes, plants, animals, and overall light pollutions are not controlled by the Lighting Policy and it cannot be used as a mitigation as written. SDSU must find lighting to be a significant, unmitigated impact.

I107-63

**Mark Nelson Comments on 4/21/17 Issued EIR on
SDSU New Student Housing Project
Environmental Impact Report
Section 8 – Significant Irreversible Environmental Changes**

MEN-COMMENT-8.1

SDSU Fails to Make a Case for Any Significant Irreversible Environmental Changes or even Significant Environmental Impacts (Section 8)

SDSU asserts that this project is based on its Sophomore Success program, and that programs findings that mandate that SDSU sophomores must live on campus. Evidence has shown that SDSU sophomores do NOT want to live on campus, with only 22% reporting in SDSU's own survey published in SDSU's own Student Housing Strategic Plan that they would seek to live in sophomore student housing is it magically met all of their housing preferences. The study instrument was biased, and the prior question asked students to list all their preferences for student housing. If all those preferences were met by the dorms, SDSU further asked if students would choose to live in the dorms. That is the genesis of the 22% rate. Put simply, if SDSU could make magic dorms that met each student's individual preferences, 4 out of 5 sophomores would still reject this imaginary place. The surveys and strategic plan were provided in response to public records requests. Reinforcing that sophomores do not seek to live on campus, only 2% of sophomores are currently "CAPTURED" by SDSU, per an SDSU December 2015 Executive Briefing document. Interesting that SDSU Housing plans to "CAPTURE" students who seek to avoid living on campus.

SDSU asserts using flawed analysis filled with self-selection bias and no causal analysis that SDSU sophomores will graduate at higher rates and with higher GPAs if they are COERCED to live in the dorms. SDSU bases this on a self-selected group of students who CHOOSE to live in the dorms. There is no basis to assert that SDSU sophomores who CHOOSE to live in the dorms resemble the population of SDSU sophomores. To the contrary, they have very different characteristics. Further, there is no basis to assume that any impact of the dorms is causal on graduation rates or timing. There is no basis presented, there is no underlying analysis. It is simply wishful thinking and unfounded analysis on the part of SDSU. The presentation providing SDSU's lack of fact basis was provided in response to public records requests. A reference to bias in sampling is found (<http://methods.sagepub.com/reference/encyclopedia-of-survey-research-methods/n526.xml>)

SDSU also fails to use current research that shows that living within walking distance to campus provides essentially all the benefits, if there are any, of living on campus. Therefore, the logical assumption is that SDSU should be targeting local students who live at home. However, this is antithetical to what SDSU is proposing. Furthermore, current research now shows that living on campus has an "inconsequential" impact, further diminishing any academic reason for SDSU's case to build dorms. References to current research are found (<http://nsse.indiana.edu/pdf/presentations/2015/NSSE%20ACUHO-I%20Presentation.pdf>, http://nsse.indiana.edu/pdf/presentations/2016/ACPA_2016_Graham_et_al_paper.pdf)

I107-64

SDSU has publicly asserted that it seeks to develop buildings that are revenue producing with student-funded stream of income. SDSU through Aztec Shops has been purchasing local apartments using tax-free state financing and reaping what amount to profits from these rentals. As a result, SDSU rejects using any of the disturbed land that these nearby rentals sit on, because it would disrupt SDSU's profitable rental business by reducing beds. Instead SDSU asserts that it should be allowed to develop in a pristine canyon and make numerous irreversible significant impacts on the environment and local area. A reference to SDSU's stated policy position of developing revenue producing buildings was made by VP Robert Schulz, proponent of this project and head of the SDSU Planning department in The Daily Aztec. (<http://www.thedailyaztec.com/82227/news/love-library-not-up-to-code-for-earthquakes/>) Further, in a December 2015 executive briefing, SDSU asserted that the new dorm project would provide "financial benefits to university" while "financial burden/cost constraint for students" and "increase bait and switch claims..." It's clear that SDSU acknowledges that COERCED campus housing is MORE EXPENSIVE than alternatives (why a financial burden if not?), PROFITABLE (financial benefits) and NOT WHAT STUDENTS WANT (bait and switch).

1107-64
Cont.

As the result of SDSU failing to make its case for the academic merits of this new development, and as the result of SDSU having a stated preference for revenue producing economic projects, SDSU should be denied any ability to have any significant impacts on the environment in this EIR. SDSU is pursuing a West Campus ECONOMIC Project to meet its stated policy preference of building revenue producing buildings as represented in this quote from the abovementioned Daily Aztec story - "the university has focused on the construction and renovation of buildings that bring in revenue, like new student housing ... because students support a fee to cover the costs of them." SDSU has found that is essentially has the ability to tax to build new buildings - if and only if - they can COERCE students to use the buildings. Any final plan with any significant impacts cannot be certified, because this SDSU plan is for an economic project, not an academic project, and economic considerations alone cannot be used to destroy the environment or enable additional heavy handed tactics of SDSU such as suppressing public information about the existence of the project from the public for over 6 years. This economically based EIR and its significant, non-mitigatable impacts should NOT BE CERTIFIED.

MEN-COMMENT-8.2 Significant Impacts on Intensification of Land Uses (Section 8.2)
Under the proposed project, SDSU acknowledges that it is creating irreversible environmental damage by "commitment of nonrenewable resources" such as pristine, undeveloped canyon. Because SDSU's Purpose and Need, also known as, Objectives, is an outright misstatement (Alternative Facts?) of the contemporary research fact base in student success, SDSU may even be committing fraud in the EIR. Unequivocally, current research demonstrates that on-campus housing is not a significant factor on student or Sophomore Success. This misrepresentation by SDSU has created a EIR with a falsified fact basis overall. Specifically, the NSSE report and summary presentation (<http://nsse.indiana.edu/pdf/presentations/2015/NSSE%20ACUHO-1%20Presentation.pdf>) The Relationship of On-Campus Living with Student Engagement from 2015 makes the following findings: 1) On most engagement measures, there were few differences between students living on campus and those within walking distance, and 2. Where differences existed, they were generally with those farther than walking distance. As a result, SDSU has far overstated the benefits of students living on campus, and further, the proportion of

1107-65

students that would benefit at all. Furthermore, 2016 follow-up research finds that there are NO BENEFITS to living on campus due to changes over the past decades, with the following statement "Changing Landscape" has led to "Student Residence has an INCONSEQUENTIAL effect." (http://nsse.indiana.edu/pdf/presentations/2016/ACPA_2016_Graham_et_al_paper.pdf) Consequently, the work by Indiana University with its current and long term, longitudinal research demonstrates that there are INCONSEQUENTIAL benefits to students from living on campus, and as a request, SDSU must recognize that SIGNIFICANT IMPACTS without any corresponding benefits fail to provide any basis for 1) approving unavoidable significant impacts or 2) requesting certification of the EIR.

MEN-COMMENT-8.3 SDSUs Proposed Project Cannot be allowed to have any Non-Mitigatable or Irreversible Significant Impacts

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."

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Response to Comment Letter I107

Mark Nelson

June 5, 2017

I107-1 The comment regards the Sophomore Success Program, stating that sophomore success is not linked to on-campus housing. The comment also 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 information regarding selection of the goals and objectives responsive to the comment.

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 and 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.

The comment cites two studies that: did not research the connection between on campus living and sophomore students and, instead, focused on only first year students; studied the relationship between living arrangements (singles, doubles, suite style room accommodations) and student engagement, and not time in years spent living on campus; "did not investigate persistence, academic gains, satisfaction, or other important outcomes that have been found to have a positive relationship with living on campus"; and, determined based on research that residence halls have the potential to positively impact the student experience.

Responses to Comments - Individuals

To the extent the comment raises economic, social or political issues that do not 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 Proposed Project.

I107-2 The comment further addresses the Sophomore Success Program, stating that sense of community and connectedness are not linked to on-campus housing. The comment is acknowledged. For information responsive to this comment, please refer to the response to Comment I107-1.

I107-3 The comment further addresses the Sophomore Success Program, stating that higher/faster graduation rates are not linked to on-campus housing. The comment is acknowledged. For information responsive to this comment, please refer to the response to Comment I107-1.

I107-4 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 the 2011 EIR prepared for the Plaza Linda Verde project, as previously explained, 2013, not 2010, is the relevant date and, in any event, the currently proposed Project was in the conceptual planning stages for several years and it was not a “probable future project” during this period.

I107-5 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 information regarding selection of the goals and objectives responsive to the comment.

Additionally, the comment generally addresses issues unrelated to the EIR, though to the limited extent it refers to “seismic safety” and “environmental obligations,” 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.

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I107-6 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 information regarding selection of the goals and objectives responsive to the comment.

I107-7 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 information regarding selection of the goals and objectives responsive to the comment.

Additionally, with respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, the comment relates to alternative siting locations relating to 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.

To the extent the comment also addresses the Sophomore Success Program, please see response to comment I107-1 for information responsive to the comment.

I107-8 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 information regarding selection of the goals and objectives responsive to the comment.

To the extent the comment also addresses the Sophomore Success Program, please also see response to comment I107-1 for information responsive to the comment.

I107-9 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 information regarding selection of the goals and objectives responsive to the comment.

I107-10 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 information regarding selection of the goals and objectives responsive to the comment. With respect to the comment related to the Strategic Housing Plan, EIR, Section 4.12, Population and Housing, includes a comprehensive analysis of the Strategic Housing Plan and its relationship to

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the proposed project and concluded there would be an increased demand for additional student housing beds and SDSU would face a housing shortage without development of a series of new construction, renovation, and acquisition projects.

- I107-11** 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 information regarding selection of the goals and objectives responsive to the comment.

Additionally, 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 previously noted, 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 response to comment I107-7 for information responsive to this comment. With respect to any additional Project siting concerns, please see the Alternatives Thematic Response for information responsive to the comment.

- I107-12** 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 information regarding selection of the goals and objectives responsive to the comment. Additionally, 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 information responsive to the comment.

- I107-13** 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 information regarding selection of the proposed project's goals and objectives that is responsive to the comment. With respect to the traffic-related comment, the significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III, which, as noted above, has been eliminated from the proposed project, along with Phase II.

As to the comment that the New Student Housing Project should have been included as a cumulative project in the 2011 Plaza Linda Verde EIR, please see response to comment I107-4 for information responsive to this comment.

The remainder of the comment incorrectly implies that SDSU had plans to develop student housing in the area of Chapultepec Hall since 2010. As previously

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noted, the reference to 2010 is based on an erroneous reference included on a SDSU consultant website. Please see response to comment I107-4 for information responsive to this comment.

I107-14 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 information regarding selection of the goals and objectives responsive to the comment.

I107-15 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, as previously noted, 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 response to comment I107-7 for information responsive to the comment. The comment also raises economic, social or political issues that do not 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.

I107-16 With respect to the comment regarding environmentally preferable siting choices and the Project's goals and objectives, relates to alternative siting locations for Phases II and III. However, as previously noted, 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 response to comment I107-7 for information responsive to this comment.

I107-17 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.

I107-18 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, as previously noted, 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 response to comment I107-7 for information responsive to this comment.

I107-19 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

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Quality Act. Please see the Alternatives Thematic Response for information regarding selection of the goals and objectives responsive to the comment.

- I107-20** The comment incorrectly claims that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” Please see response to comment I107-4 for information responsive to this comment. The comment also 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.
- I107-21** The comment states the proposed project should have been included as a cumulative project in either the 2007 Campus Master Plan EIR, the 2011 Plaza Linda Verde EIR. Please see response to comment I107-4 for information responsive to this comment.
- I107-22** The comment states the proposed project should have been included as a cumulative project in either the 2007 Campus Master Plan EIR, the 2011 Plaza Linda Verde EIR. Please see response to comment I107-4 for information responsive to this comment. Regarding the piece-mealing comment, please see the responses to comments submitted in comment letter I166 and I167.
- I107-23** The comment claims the EIR assigns less than significant assessments to electricity, including any impacts of related outage of the Aliso Canyon natural gas storage that feeds electricity, yet it never defines the metrics that it will use. There is no reference to Aliso Canyon in the EIR as it pertains to energy or electricity. The utility provider that SDSU uses for purchased electricity does not purchase natural gas from Southern California Gas Company which owns and operates Aliso Canyon. As shown in EIR Section 4.5.6, the project’s significance was determined based on CEQA Guidelines Appendix F.
- I107-24** Please see the response to comment I107-23 for information responsive to this comment.
- I107-25** Please see the response to comment I107-23 for information responsive to this comment.
- I107-26** The comment claims that metrics were not assigned to assess significance for GHG emissions and that GHGs from certain sources were not considered. The EIR’s analysis of GHG emissions complies fully with the requirements of the California Environmental Quality Act. Please see EIR section 4.7.5 for the applicable thresholds of significance.

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- I107-27** The comment claims that energy-related impacts must be significant if the electricity sources are not named. However, please see EIR section 4.5.6 for the energy mix for SDSU.
- I107-28** The comment claims that the EIR's analysis of energy-related impacts is flawed for failing to utilize appropriate significance thresholds. However, the EIR's analysis of the project's potential energy impacts utilized the appropriate thresholds. See EIR section 4.5.5.
- I107-29** The comment claims the EIR's analysis of energy-related impacts is flawed for failing to consider the effects of the Aliso Canyon natural gas storage facility. However, the utility provider that SDSU uses for purchased electricity does not purchase natural gas from Southern California Gas Company, which owns and operates Aliso Canyon. Therefore, no such analysis was required. Please see response to comment I107-23 for additional information responsive to this comment.
- I107-30** The comment claims that energy-related impacts must be significant if the natural gas sources are not named. However, please see EIR section 4.5.6 for the energy mix for SDSU.
- I107-31** The comment claims that the EIR's analysis of energy-related impacts is flawed for failing to utilize appropriate significance thresholds. However, the EIR's analysis of the project's potential energy impacts utilized the appropriate thresholds. See EIR section 4.5.5.
- I107-32** The comment claims the EIR's analysis of energy-related impacts is flawed for failing to consider the effects of the Aliso Canyon natural gas storage facility. However, the utility provider that SDSU uses for purchased electricity does not purchase natural gas from Southern California Gas Company, which owns and operates Aliso Canyon. Therefore, no such analysis was required. Please see response to comment I107-23 for additional information responsive to this comment.
- I107-33** The comment regards the methodology used to assess geotechnical hazards. With respect to the maximum magnitude of the La Nacion Fault, it appears that an old version of the City of San Diego General Plan, Seismic Safety Element (SSE) is available online, as evidenced by the link provided in the comment. The updated City SSE was completed in June 2015, as an updated section to the 2008 General Plan (<https://www.sandiego.gov/planning/genplan#genplan>). Note that on page 243 of the older (undated) version of the SSE, the sources of seismic information were based on reports from 1974 and 1977. The maximum credible earthquake on the La Nacion Fault of magnitude 6.7, as described in the older SSE, is a Richter magnitude, which is typically not used by today's seismologists, geologists, and geotechnical engineers.

Rather, earthquakes are described in terms of moment magnitudes, denoted with an “M” or “M_w”. (Please see https://www.iris.edu/hq/inclass/animation/magnitudes_moment_magnitude_explained.) As explained in this link, Richter scale is mostly effective for regional earthquakes no greater than M5. Moment magnitude is more effective for large earthquakes and uses more variables to calculate the energy released during an earthquake.

The source of the information provided in the EIR (page 4.6-4) indicating a maximum credible earthquake of 6.2 to 6.6, which is based on San Diego County Offices of Emergency Services (OES 2017), should have been described as “M6.2 to M6.6 (moment magnitude)”. Therefore, the Final EIR includes appropriate revisions and a brief explanation regarding moment magnitude vs. Richter, as this can be a source of confusion.

Regarding grading and excavation activities, as indicated on page 4.6-18 of the EIR, the project site is geotechnically suitable for the proposed development; however, substantial remedial grading and/or deep foundations would be needed to develop the site to provide long-term performance of the new buildings and associated exterior surface improvements. This information is based on Appendix A (2013 URS Geotechnical Report) of Appendix G – Geotechnical Resources Technical Report, which indicates that “substantial remedial grading” would be required in association with the Project. However, the URS report does not quantify the amount of excavations/grading required. As indicated in the URS report, the majority of the existing fill is undocumented and, therefore, may need to be removed, depending on which type of foundations are chosen. The fill could either be excavated and recompacted, or alternatively, deep pile foundations could be placed through the undocumented fill. Section 3.4.1 of the URS geotechnical report describes fill underlying the western parking lot up to 15 feet and up to 30 feet underlying the eastern parking lot. Such a depth of fill represents a substantial amount of fill. In addition, existing steep fill slopes do not meet current site development and grading codes. Therefore, these slopes may require additional work, potentially involving substantial earth work activities. Combined, these activities may require substantial remedial grading.

The URS report is not a design-level report. This preliminary geotechnical report summarizes the geologic/geotechnical conditions at the site and provides general geotechnical conclusions in order that the applicant/contractor can generally understand the feasibility and amount of work needed for construction. This level of detail is adequate with regard to completion of the Geotechnical Resources section of the EIR. Quantification of earthwork would be determined during final design of each project phase. For that reason, no further response to this comment is provided.

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- I107-34** The comment regards the La Nacion fault. Please see response to comment I107-33 for information responsive to this comment.

With respect to the seismic engineering of the existing Chapultepec Hall, this building is not part of the proposed project. 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.

- I107-35** The comment claims the EIR's analysis of GHG impacts is flawed because named electricity generation sources must be cited. However, see EIR section 4.5.6 for the energy mix for SDSU.

- I107-36** The comment claims the EIR's analysis of GHG impacts is flawed because it does not provide objective data or measurement set to evaluate emissions significance. However, the EIR's analysis of GHG emissions complies fully with the requirements of the California Environmental Quality Act. Please see EIR section 4.7.5 for the applicable thresholds of significance.

- I107-37** The comment claims that the EIR's GHG analysis is inadequate because it does not take into account areas immediately adjacent to the Project site. However, the scope of the EIR's analysis of GHG emissions complies fully with the requirements of the California Environmental Quality Act.

- I107-38** The comment claims the EIR's GHG analysis is inadequate in that there are no mechanisms in place to reduce GHG emissions to comply with future reduction requirements. However, GHG reduction goals are taken into account in the budgets assumed within the significance criteria shown in EIR Section 4.7.5. Therefore, the project's GHG emissions were evaluated against the state's GHG reduction goals.

The comment also claims that SDSU must not remove itself from other projects and mitigate emissions. The Project did not exceed significance thresholds and impacts are less than significant, as shown in Sections 4.7.5 and 4.7.6. Therefore, mitigation is not required.

- I107-39** The comment claims the EIR does not evaluate the Project's GHG emissions against disadvantaged and low-income communities. However, CEQA does not require that disadvantaged or low-income communities be evaluated within a GHG section.

- I107-40** The comment raises general criticism of the EIR's analysis of fire hazards, and requests that project phases II and III not be built. As previously explained, the proposed project has been modified and no longer includes project phases II and III. Please see response to comment I107-7 for additional information. As to the EIR's

- hazards analysis, 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. However, 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 does not encourage or facilitate access into the adjacent canyon, and has been determined to not increase risk or exposure to wildfire.
- I107-41** The comment suggests mitigation measures related to fire hazards. Please see response to comment I107-40 for information responsive to the comment.
- I107-42** The comment states the EIR fails to address potential impacts associated with sexual assault. To the extent required by CEQA, law enforcement related issues are addressed in EIR Section 4.13, Public Services and Utilities. Beyond this, 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.
- I107-43** The comment states the EIR provides no objective discussion of what constitutes a significant aesthetic impact. Please refer to EIR subsection 4.1.6, Impacts Analysis, included in Section 4.1, Aesthetics. Under the "would the project substantially degrade the existing visual character or quality of the site and its surroundings" thresholds, the EIR analysis evaluates the general visual character of the Project including the proposed architectural style and assesses the bulk, scale, and character of Project development as viewed from locations in the surrounding area. The key view analysis is provided to examine the overall compatibility of the proposed development in the context of existing elements in the surrounding area. Under the heading "Key View Impacts Summary" the EIR determines that while the architectural style proposed for the residence halls and food service building that are part of Phase I development would generally be consistent with the existing campus structures designed in the Spanish Colonial, and Mission Revival styles, the bulk and scale of Phase II and Phase III development would generally create strong form and line contrast in the landscape. However, as previously noted, 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 environmental impacts would be less than significant. Please see Final EIR, Preface, for additional information regarding the project modifications.

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- I107-44** The comment states that the Project and existing Chapultepec Hall are “extremely different styles,” a poor match, and the new buildings create a significant impact in architectural style. The EIR does not solely rely on Chapultepec Hall to determine aesthetic effects associated with the architectural character of the Project. The architectural style of the Project is analyzed in Section 4.1, Aesthetics of the EIR. Section 4.1 determined that Project buildings would be architecturally consistent with the Spanish Colonial and Mission Revival styles of the original SDSU campus buildings. Specifically, the inclusion of large, lightly colored, relatively unadorned walls, roofs of reddish hued materials, arched window openings, and square towers is deliberate and would aesthetically link the Project’s architecture to existing Spanish Colonial and Mission Revival styled structures on campus.
- I107-45** The comment states Phase I is materially different from existing Chapultepec Hall and, therefore, results in significant aesthetics-related impacts. Please refer to response to comment I107-44 above for information responsive to the comment. As previously noted, the EIR does not solely rely on Chapultepec Hall to determine aesthetic effects associated with the scale and architectural character of the Project. CEQA requires that a project be examined in the context of the existing quality and character of the site and surrounding area and as such, the EIR considers existing on- and off-campus development in its determination of impacts concerning the scale and style of Project buildings.
- I107-46** The comment states Phase II is out of scale and architecture with both Chapultepec and the existing community. However, as previously explained, the proposed project has been modified to eliminate both Phases II and III. Please see response to comments I107-7 for additional information responsive to the comment.
- I107-47** The comment states Phase III is out of scale with the community. However, as previously explained, the proposed project has been modified to eliminate both Phases III and II. Please see response to comments I107-7 for additional information responsive to the comment.
- I107-48** The comment claims that the EIR noise analysis is insufficient because it failed to analyze the noise that would be generated by the project. Preliminarily, the comment assumes development of a three-phase project that would provide housing for up to 2,700 students. However, as previously explained, the proposed project has been modified to eliminate both Phases II and III and, therefore, would provide housing for approximately 850 students.

Additionally, potential noise impacts from both construction and operation of the proposed project were analyzed and assessed based on application of accepted methodologies and consistent with CEQA’s requirements in Section 4.11, Noise, of

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- the EIR. Any noise generated by students living within the new housing would be incidental to the existing ambient environment and would not exceed the applicable thresholds of significance. Additionally, the EIR determined that with implementation of Mitigation Measures MM-NOI 1 through MM-NOI 3, noise impacts would be reduced to a level of less than significant.
- I107-49** The comment suggests mitigation measures to reduce the potential noise impacts related to the project. However, the EIR determined that with implementation of Mitigation Measures MM-NOI 1 through MM-NOI 3, noise impacts would be reduced to a level of less than significant. Therefore, no additional mitigation is required.
- I107-50** The comment is critical of the methodology utilized to conduct the EIR's traffic analysis. However, the analysis properly relied on a trip generation rate based on a comparable university campus, and also properly relied on the San Diego Association of Governments (SANDAG) travel demand model to determine trip distribution. The Project's impacts relative to traffic were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the EIR. Please also see the responses to comments O6-24 through O6-32 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.
- I107-51** The comment states that development of the proposed project on disturbed space would be less environmentally damaging relative to water quality. Preliminarily, as previously explained, the proposed project has been modified and no longer includes development of Phases II and III; only Phase I would be developed. Therefore, as modified, the proposed project would be developed on parking lot U, which is disturbed space. EIR Section 4.9, Hydrology and Water Quality, determined that the proposed project would reduce impacts related to loss of soil and erosion to a less-than-significant level with implementation of a Stormwater Pollution Prevention Plan (SWPPP). The comment claims that the proposed project would increase the loss of topsoil and increase erosion, however, as described in Section 4.6 Geotechnical Resources, of the EIR, sub\section 4.6.6 Impacts Analysis, the Project would be in compliance with federal- and state-mandated erosion control measures resulting in less than significant impacts from erosion. 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. The comment is critical of the Project's goals and objectives; however, the goals and objectives fully comply with the

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requirements of the California Environmental Quality Act. Please see Alternatives Thematic Response for information regarding the selection of goals and objectives responsive to the comment.

I107-52 The comment states the proposed project is “overbuilding,” and addresses SDSU’s Student Housing Strategic Plan. As previously noted, the proposed project has been modified and no longer includes Phases II and III; only Phase I would be developed. Therefore, the “overbuilding” comment is no longer applicable. As to the Student Housing Strategic Plan, please see response to comment I107-10 for information responsive to the comment.

I107-53 The comment raises concerns regarding Valley Fever. Preliminarily, as the comment relates to development adjacent to the canyon, and as previously explained, the proposed project has been modified and no longer includes Phases II and III, which are the two phases that would be developed nearest to the canyon. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, to the extent the comment is directed towards Phases II and III, the comment is no longer applicable. Nonetheless, as the proposed project would include development in the general proximity of the canyon, the following information is provided relative to Valley Fever. Please also see response to comment I124-2 for additional information responsive to this comment.

Coccidioidomycosis, more commonly known as “Valley Fever,” is an infection caused by inhalation of the spores of the *Coccidioides immitis* fungus that commonly grows in the soils of the southwestern United States. When fungal spores are present, any activity that disturbs the soil, such as digging, grading or other earth moving operations, can cause the spores to become airborne and thereby increase the risk of exposure. The ecologic factors that appear to be most conducive to survival and replication of the spores are high summer temperatures, mild winters, sparse rainfall, and alkaline sandy soils.

The County of San Diego Health and Human Services Agency (HHSA) compiles Valley Fever rates per zip code. Based on HHSA information, the Project site is within an area with the lowest background risk of Valley Fever in the County (County of San Diego 2008). In addition, according to the California Department of Public Health (CDPH), an average of 115 confirmed cases of Valley Fever were reported in San Diego County each year between 2011 and 2015 (CDPH 2016). The CDPH data shows the number of confirmed Valley Fever cases is declining. Accordingly, there is no evidence to suggest Valley Fever is a significant concern within the vicinity of the Project site.

While the risk of releasing Valley Fever spores during the Project's construction phase is reasonably anticipated to be low, based on the location of the Project site, it also should be noted that SDSU would comply with SDAPCD Rule 55 (which establishes fugitive dust abatement measures, including watering disturbed areas on the Project site three or more times per day during the construction phase, to minimize adverse air quality impacts). This watering requirement is consistent with CDPH recommendations for the implementation of dust control measures, including regular application of water during soil disturbance activities, to reduce exposure to Valley Fever – the watering minimizes the potential that the fungal spores become airborne (California Department of Public Health 2013). Further, regulations designed to minimize exposure to Valley Fever hazards are included in Title 8 of the California Code of Regulations and would be complied with during the Project's construction phase (see <http://www.dir.ca.gov/dosh/valley-fever-home.html>).

In summary, the Project would not result in a significant impact attributable to Valley Fever exposure based on its geographic location and compliance with applicable regulatory standards that serve to minimize the release of and exposure to fungal spores.

I107-54 The comment regards alternative project locations previously included in the 2007 Campus Master Plan EIR, including Olmeca/May Hall. Please see the Alternatives Thematic Response for information responsive to the comment. The comment also refers to the 2007 EIR as certified. However, the California State University Board of Trustees' prior approval of the 2007 Campus Master Plan EIR was set aside following litigation and, therefore, the 2007 Master Plan is not presently operative. Lastly, with respect to 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 previously explained, the proposed Project has been modified to eliminate Phases II and III and, therefore, this portion of the comment is no longer applicable.

I107-55 The comment refers to Chapultepec Hall, which is not part of the proposed project, and is also critical of Phases II and III. However, as previously explained, the proposed Project has been modified to eliminate Phases II and III and, therefore, this portion of the comment is no longer applicable.

I107-56 The comment refers to the 2007 Master Plan EIR and Olmeca/Maya Hall and states that the EIR considered improper site alternatives. Please see response to comment I107-54 for information responsive to this comment.

I107-57 The comment states there is no "basis in fact" for the EIR's determination that under the proposed project, impacts to shading and shadow, and day and nighttime views would be less than significant. However, Please refer to EIR subsection 4.1.5,

Thresholds of Significance, in Section 4.1, Aesthetics, explains the guidelines utilized in the EIR to evaluate the potential shadow and shading effects of the Project. As explained, neither CEQA Appendix G or the City of San Diego have established significance thresholds for duration of shadow and shading conditions on sensitive land uses. Therefore, significance thresholds of other jurisdictions were reviewed for use in the analysis. The City of Los Angeles shadow and shading guidelines were eventually used because the conditions of the proposed project most closely resemble those found in cities like Los Angeles. Specifically, the proximity of the proposed project to residential land uses (i.e., shadow-sensitive uses) and the expressed shade and shadow concerns of local residents resembles the potential conflict occurring between tall structures and existing nearby shadow-sensitive uses in denser cities. Shadow-sensitive uses are located west of the Project site and would potentially be exposed to shadows cast by project buildings. Therefore, the Los Angeles CEQA thresholds were used to evaluate shadow effects associated with Project buildings.

- I107-58** The comment states that the EIR erroneously asserts that the No Project and Reduced Density Alternatives do not meet the project objectives. Please see the Alternatives Thematic Response for information responsive to this comment.
- I107-59** The comment is critical of the EIR Alternatives' analysis reliance on the Sophomore Success Program. Please see response to comment I107-1 for information regarding the Sophomore Success Program provided in response to prior critical comments. Please also see the Alternatives Thematic Response for additional information responsive to the comment.
- I107-60** The comment states SDSU is entering into a "speculative activity" with development of the proposed project, and refers to the project's significant and non-mitigatable impacts. As to the latter comment, as previously explained, the proposed project has been modified to eliminate development of Phases II and III and, therefore, there would be no significant unavoidable impacts; all identified significant impacts would be reduced to less than significant with recommended mitigation. As to the comment regarding "speculative activity," the comment raises economic, social or political issues that do not 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.
- I107-61** The comment is critical of existing Chapultepec Hall, which is not part of the proposed project, and asserts SDSU now seeks to correct prior failures by "destroying the environment and creating non-mitigatable significant environmental impacts." As previously noted, the proposed project has been modified to eliminate Phases II and III and would no longer result in significant unavoidable impacts. Beyond this, the

comment offers general criticism of issues that 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.

I107-62 The comment refers to the City of San Diego General Plan Land Use Designation Map, with the undeveloped canyon shown as open space. The open space land use designation is accurately described in the EIR along with the institutional uses in Section 4.10, subsection 4.10.3, Existing Conditions. As stated on page 4.10-1 “[t]he existing land uses immediately surrounding the proposed project site include a mixture of residential, institutional (university), and open space uses (see Figure L-U2 in City of San Diego 2008).” Furthermore, the Project’s relationship to the open space land use is described in the second paragraph on page 4.10-1, “[t]he northern boundary of the proposed project site directly abuts the open space area, and consists of a steep-sloping canyon generally surrounded by single-family and multifamily residential development.” However, as described on page 4.10-5, as a state agency, the City of San Diego General Plan is not applicable to CSU/SDSU and because the proposed project is consistent with the Campus Master Plan amendment, the Project does not conflict with any applicable land use plan.

I107-63 The comment incorrectly asserts that the analysis of lighting impacts from the proposed project relies upon the SDSU Lighting Policy and this policy does not protect sensitive receptors like surrounding homes, plants and animals. As described in Section 4.1.6, Aesthetics, SDSU’s lighting policy voluntarily follows adopted City of San Diego lighting ordinances and regulations to reduce potential lighting impacts from construction and operation of the proposed project on local observatories, residential areas, and sensitive biological resources. Furthermore, the lighting impacts of the Project are fully evaluated in Section 4.1, Aesthetics, of the EIR. As demonstrated in Section 4.1, the calculations for Project lighting illuminance included the lighting equipment required to provide the appropriate illumination for this facility, which would be designed to provide site and interior lighting as required by code and by best practices. Further, building lighting must comply with the light trespass limits stipulated by CALGreen, and based on the illuminance calculations data presented in Table 4.1-10, lighting levels (as measured at receptor sites), would be below the CEQA significance threshold and would result in a less-than-significant impact.

I107-64 The comment regards the Sophomore Success Program. Please see response to comment I107-1 for information responsive to the comment. The comment also 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

Responses to Comments - Individuals

see the Alternatives Thematic Response for information regarding the selection of project goals and objectives that is responsive to this comment. Beyond this, the comment raises economic, social or political issues that do not 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.

I107-65 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. Please see the Alternatives Thematic Response for information regarding the selection of project alternatives responsive to this comment. Please also see response to comment I107-1 regarding the Sophomore Success Program. Beyond that, the comment does not raise any specific issue regarding the EIR 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.

I107-66 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 mitigated to less than significant.

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Comment Letter I108

On Mon, Jun 5, 2017 at 10:26 AM, Rene Kaprielian <renekaprielian@yahoo.com> wrote:
Dear San Diego State University,

I'm writing in response to the draft EIR for the dorm project proposed for the west end of the SDSU campus. Our questions and comments are as follows:

- I108-1
I'm writing in response to the draft EIR for the dorm project proposed for the west end of the SDSU campus. Our questions and comments are as follows:
- I108-2
* Why does SDSU want to build 11 and 14 story structures in Aztec Canyon, which is considered by city, state, and federal governments as environmentally sensitive land, and on a two-lane residential street adjacent to single family homes?
- I108-3
* What flawed criteria was used to allow environmentally sensitive land to be selected as the best location for this project?
- I108-4
* Why isn't SDSU placing high density student housing around the trolley and transit center on campus?
- I108-5
* Does SDSU have a climate action plan, if so, how does this project help SDSU achieve its goal? If it doesn't have a climate action plan, why not?
- I108-6
* Why does SDSU think placing 3,500 students a half mile from the trolley and transit center is smart urban and campus planning?
- I108-7
* Why did SDSU hold it first meeting with the neighboring community about this project in January 2017, when it was planned and drawings were created as early as 2010?
- I108-8
* Why isn't SDSU working with the City of San Diego to plan a high density "University District" around the campus core and public transit?
- I108-9
* Why didn't SDSU, in conjunction with Aztec Shops, place 14-story student housing on College Avenue, steps away from the trolley, the new student center, and Trader Joe's?
- I108-10
* The dorm project calls for nearly 3,000 students. What improvements would be made to slow down traffic on Remington Rd.?
- I108-11
* Would there be any physical barriers to separate bike from cars? If not, why not?
- I108-12
* How will this project be pedestrian and bike friendly?
- I108-13
* Where will the 30% of students, who have a car, park at night? Will it be the neighboring community? Why was this not addressed in the draft EIR?
- I108-14
* Why wasn't a real traffic study performed for the proposed location as part of the EIR?
- I108-15
* What impact will cars picking up and dropping off students have on the neighboring community when they enter and leave the area? Why didn't the draft EIR sufficiently address this impact?
- I108-16
* There is an insufficient number of parking spaces for picking up and dropping off students living in the dorms. What calculations were used to determine the number spaces allocated for the combined 3,500 students living in the dorm complex?

Responses to Comments - Individuals

- * Was a study performed to assess how cars will come and go during the day and night picking up and dropping off dorm residents? How will SDSU insure bike lanes will be clear at all times to insure a safe traffic environment on Remington Rd. for its students and neighbors? I108-17
- * What mitigations are there to eliminate the risk of fire in the canyon? I108-18
- * The draft EIR does not sufficiently address how the project will meet the requirements of AB1826 as it pertains to the collection and storage of food waste, other organics and solid waste generated from the project. I108-19
- * Why doesn't SDSU have an updated master plan that would eliminate piecemeal development on campus? I108-20

Sincerely,

Rene and Marialuisa Kaprielian
SDSU Class of 1987

Response to Comment Letter I108

Rene and Larialuisa Kaprielian

June 5, 2017

- I108-1** The comment is an introduction to comments that follow. No further response is required.
- I108-2** 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.
- I108-3** 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.
- I108-4** 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.
- I108-5** The comment asks if SDSU has a climate action plan and if so, how does the Project help to achieve its goal. At the time the Draft EIR was under preparation, SDSU did not have a climate action plan. The SDSU climate action plan was finalized and released to the public during the public comment period of this Draft EIR. In response, a supplemental analysis was performed to show whether the Project was consistent with the adopted climate action plan (Dudek, June 2017). This analysis showed that the Project was consistent with SDSU's climate action plan and would support its goals to reduce GHG emissions from the campus.
- I108-6** 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

- I108-7** 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 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.
- I108-8** 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.
- I108-9** 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.
- I108-10** 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 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.
- I108-11** 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.
- I108-12** The comment addresses general subject areas, which received extensive analysis in the EIR. The Project’s impacts relative to modes of transport 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.

Responses to Comments - Individuals

- I108-13** The comment asks why student parking in the neighboring College View Estates neighborhood was not addressed in the Draft EIR. The comment is incorrect. Section 4.14, Transportation/Circulation and Parking, of the EIR addresses the Project's potential impacts relative to parking in subsection 4.14.6.4, and specifically addresses College View Estates Spillover Parking on pages 4.14-40-41. Because the comment does not raise any specific issue regarding the analysis, 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.
- I108-14** The comment asks why a "real traffic study" was not prepared for the EIR. The comment addresses general subject areas, which received extensive analysis in the EIR. The Project's impacts relative to traffic were fully addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the EIR and supporting transportation technical report (Appendix K). Because the comment does not raise any specific issue regarding the analysis, 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.
- I108-15** The comment addresses general subject areas, which received extensive analysis in the EIR. The Project's impacts relative to student drop off and pick up 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.
- I108-16** 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 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.
- I108-17** The comment asks about pick-ups/drop-offs, and related bike lane safety clearance. The proposed project includes off-street space in front of the new buildings for up to six vehicles to accommodate pick-ups/drop-offs. This will alleviate the present condition of vehicles blocking the Remington Road vehicle and bicycle right-of-way.
- I108-18** The Project's Fire Fuel Load Analysis Report (Dudek 2017) includes an extensive analysis of the adjacent native vegetated areas and their potential fire risk. Fire behavior modeling was conducted to determine the type of wildfire that can be anticipated during typical conditions and under extreme fire weather. The Project incorporates 2016 California Fire (Chapter 49) and Building Code (Chapter 7A) ignition resistant requirements and exceeds them in many respects. The Project includes a brush management zone around all structures, utilizes 10- to 36-foot tall

Responses to Comments - Individuals

retaining walls as fire barriers, and ember resistant vents, and upgraded windows. These measures result in defensible structures that would not demand a high concentration of fire department resources to defend against the moderately aggressive, but short-duration wildfire that could occur within Aztec Canyon.

I108-19 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.

I108-20 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. 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

Comment Letter I109

On Mon, Jun 5, 2017 at 10:41 AM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name Adam Klekowski

Address 5139 Walsh Way

Phone number [8582121323](tel:8582121323)

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

I109-1

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

I109-2

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

I109-2
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:

I109-3

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.

I109-4

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.

I109-5

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.

1109-6

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.

1109-7

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.

1109-8

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

1109-9

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.

↑
I109-9
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.

I109-10

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.

I109-11

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.

I109-12

Responses to Comments - Individuals

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.

I109-13

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."

I109-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I109

Adam Klekowski

June 5, 2017

I109-1 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.

I109-2 The comment that the Draft EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the 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.

I109-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments - Individuals

- I109-4** 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.
- I109-5** 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.
- I109-6** 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.
- I109-7** 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.
- I109-8** 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.
- I109-9** 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.

- I109-10** 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 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.
- I109-11** 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 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 Chapters 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.
- I109-12** 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 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)
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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, as noted in the prior responses, the proposed project has been modified and no longer includes the development of Phases II and III.

I109-13 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, 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.

I109-14 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 I110

On Mon, Jun 5, 2017 at 10:54 AM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:

Letter from the concerned residents of the College Area.

Name Kimberly Wilson

Address 5172 College Gardens Court

Comments

I would like an explanation of why SDSU did not include traffic flowing through our neighborhood in the traffic report. Specifically, Remington to Hewlett to College Gardens Court to Yerba Anita to Mesquite to Yerba Santa and in the reverse. These streets were completely missing in your traffic mitigation slide at the last public meeting and yet your own security guards stand at the entrance and exit of our community to try and stem the flow of traffic during big events. The amount of traffic barrelling through our residential neighborhood with small children, elderly, cats and dogs will increase enormously if you put these dorms at the edge of our neighborhood. At best, it is negligent not to include the impact of traffic on our neighborhood streets.

I110-1

The first step in dealing with a problem is recognizing its source. SDSU continues to add more and more students to a campus that has already reached capacity. The university should accept these limitations rather than building on extremely unacceptable sites at the very edge of their boundaries in an insatiable bid to expand and grow in an unsustainable manner. The behavior is more akin to a rabid corporation in its pursuit of market domination than an institution of higher learning. Please focus on quality education rather than quantity.

I110-2

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

Responses to Comments - Individuals

San Diego, California
92182-1624
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.

I110-3

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.

I110-4

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:

I110-5

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

I110-6

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.

↑
I110-6
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.

I110-7

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.

I110-8

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.

I110-9

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 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.

I110-10

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.

I110-11

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.

I110-12

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

I110-13

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.

I110-13
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.

I110-14

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 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.

I110-15

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."

I110-16

Responses to Comments - Individuals

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
mcollins@mail.sdsu.edu

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

Response to Comment Letter I110

Kimberly Wilson

June 5, 2017

- I110-1** The comment states that the EIR failed to consider traffic flowing west on Remington Road, through the College Gardens area. The comment is incorrect. 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 Gardens area; thus, traffic through the College Gardens area was considered as part of the analysis. 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, and Final EIR revised Figure 8-1.) For additional information responsive to this comment, please also see the responses to comments O-6-29 through O-6-32.
- I110-2** 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.
- I110-3** 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

Responses to Comments - Individuals

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.

- I110-4** The comment that the EIR is "insufficient" and that there are "feasible alternatives" 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.
- I110-5** The comment is an introduction to comments that follow. No further response is required.
- I110-6** 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

Responses to Comments - Individuals

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

- I110-7** 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.
- I110-8** 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.
- I110-9** 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.
- I110-10** 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.
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Responses to Comments - Individuals

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Responses to Comments - Individuals

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.

I110-15 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, 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.

I110-16 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

Comment Letter I111

On Mon, Jun 5, 2017 at 11:02 AM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name	Errol Tonsky
Address	5504 Dorothy Drive
Phone number	619 917-4351

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

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

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I111-1

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

I111-2

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

I111-2
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:

I111-3

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.

I111-4

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.

I111-5

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.

I111-6

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.

I111-7

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.

I111-8

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

I111-9

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.

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I111-9
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.

I111-10

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.

I111-11

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.

I111-12

Responses to Comments - Individuals

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.

|111-13

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."

|111-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I111

Errol Tonsky

June 5, 2017

I111-1 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.

I111-2 The comment that the EIR is “insufficient” and that there are “feasible alternatives” 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.

I111-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments - Individuals

- I111-4** 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.
- I111-5** 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.
- I111-6** 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.
- I111-7** 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.
- I111-8** 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.
- I111-9** 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.

- I111-10** 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 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.
- I111-11** 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 Chapters 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.
- I111-12** 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 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 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.

I111-13 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, 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.

I111-14 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 I112

From: <renstn@cox.net>
Date: Sat, Jun 3, 2017 at 6:31 PM
Subject: SUBJECT: Formal comments for SDSU New Student Housing Project Draft Environmental Impact Report (4/21/17) (#2)
To: LShinn@mail.sdsu.edu

Dawn Reser
5118 Bixel Dr.
San Diego, CA 92115
renstn@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

SUBJECT: Formal comments for SDSU New Student Housing Project Draft Environmental Impact Report (4/21/17) (#2)

Like many of my fellow residents and attendees of the May 8, 2017 public meeting regarding SDSU's planned project, I was horrified to see the changes made to the project since the January 18, 2017 scoping meeting. I was heartened to read President Hirshman's directive that SDSU "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"; however, the impacts of Phase I are not appropriately mitigated in the Draft Environmental Impact Report (EIR).

I fully support the creation of a community for Chapultepec Hall, but do not believe that the destruction of the canyon or quality of life for the single-family neighborhood is justified. The location of Phase I of this project is appropriately placed, but the stated mitigations for the three phases for canyon destruction and vehicle and pedestrian traffic in the Draft EIR are not sufficient.

At the May 8 meeting, it was stated that the destruction of the canyon was deemed "unavoidable and unmitigatable" because it was "unencumbered by other uses". I fail to understand why a

I112-1

I112-2

I112-3

Responses to Comments - Individuals

viable wild habitat is not considered by SDSU to be an acceptable use and worthy of preserving. I would appreciate SDSU clearly stating why the alternative sites – many of which are already disturbed land – are worth maintaining in their current state, and why a natural habitat is worthy of destruction.

I112-3
Cont.

There currently is no safe location for students and their families to park their vehicles for move out or move in. The Draft EIR notes in passing a ten-spot location at the front of the project for this purpose. How are ten spots sufficient for the number of beds to be located in Chapultepec Hall and the Phase I building? In addition, there is no location stated in the Draft EIR for commercial trucks to deliver to the new food service areas. The remaining location will be Remington Road – from where currently Chapultepec residents and commercial trucks stop. This is unacceptable. I would appreciate SDSU clearly stating the vehicular infrastructure that they will build in order to appropriately support the number of individuals living and visiting the new community..

I112-4

The current sidewalks are not wide enough to handle the foot traffic from Chapultepec (800 residents). There is no mitigation stated in the Draft EIR that would handle the increased planned residents of Phase I let alone to handle the current foot traffic. This is unacceptable. I would appreciate SDSU clearly stating the pedestrian infrastructure that they will build in order to appropriately support the number of individuals living and visiting the new community.

I112-5

I also wish to include comments about Phase II and Phase III during this formal comment period.

I112-6

In the May 8 meeting, it was stated that the site selected for the 14-story building was picked because of “lack of costly engineering constraints”. Wouldn’t erecting such a building in a canyon be the definition of “costly engineering” in order to have a stable and safe structure? I would appreciate SDSU clearly stating the more costly engineering that exist for all of the alternate sites listed in the Draft EIR. In addition, they should hire an independent engineering firm to provide analysis of these claims.

I112-7

In the May 8 meeting, it was stated that Phase II will impact .59 acres of coastal sage scrub habitat while Phase II will impact 1.92 acres of the same. What other habitats were not considered worthy enough to be mentioned by SDSU that will also be destroyed by this project? I would appreciate SDSU clearly delineating all habitats and flora and fauna that will be destroyed by this project.

I112-8

In the May 8 meeting, details regarding gnatcatcher surveys was presented. Five surveys were done in 2014 and one as done in 2017. The company overseeing these surveys is the same company advising SDG&E during the construction in College View Estates for the undergrounding of the utilities. SDSU asserts that there are no gnatcatchers in the canyons, but the undergrounding work has been halted recently due to gnatcatchers in the canyon. I would appreciate SDSU explaining why their company has advised them that there are no gnatcatchers in the canyon while the same company is advising SDG&E that work must be halted due to gnatcatchers.

I112-9

My final concern is one of trust of SDSU. If five gnatcatcher surveys were conducted in 2014,

I112-10

Responses to Comments - Individuals

why was the community not informed of this massive construction project until December 2016, with a comment period spanning a time of holiday? I would appreciate SDSU releasing their overall plan for the campus, both formal and informal, instead of this piecemeal Draft EIR.

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Cont.

Sincerely,

Dawn Reser

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Response to Comment Letter I112

Dawn Reser

June 3, 2017

- I112-1** The comment is an introduction to comments that follow. No further response is required.
- I112-2** See Biological Resources Thematic Response, which states that Phases II and III will not be developed. Phase III included the most impacts to the canyon. Phase I does not impact the canyon.
- I112-3** 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. Please also see the Biological Resources Thematic Response for additional information responsive to the comment.
- I112-4** The comment addresses general subject areas, which received extensive analysis in the EIR. The Project's impacts relative to on campus move in, student drop off and pick up, and 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.
- I112-5** The comment states the existing sidewalks are not wide enough to handle foot traffic from Chapultepec and asks how the increased foot traffic resulting from the Project will be handled. The existing sidewalks comply with applicable standards and are inadequate to support both existing pedestrian traffic, and increased traffic. The proposed project would provide primary pedestrian access on 55th Street and all sidewalks constructed as part of the project would comply with applicable standards. The Project includes a courtyard design that, along with the related redesign of the Chapultepec entry and courtyard, will encourage residents of the existing Chapultepec Hall to use the new eastern entry on 55th Street.

Responses to Comments - Individuals

- I112-6** The comment is an introduction to comments that follow. However, please note that 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.
- I112-7** The comment is an introduction to comments that follow. No further response is required.
- I112-8** The comment restates information contained in the 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.
- I112-9** The comment is referring to a California gnatcatcher survey was completed by Dudek for 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. One individual gnatcatcher was detected at that site on March 10, 2017 during the second survey pass, but was not detected during the first or third passes. This individual gnatcatcher did not appear to be paired with another bird. In summary, the individual gnatcatcher was not detected more than once during the survey period, was determined not likely to utilize this area as breeding or nesting habitat by the federally permitted biologist, and the gnatcatcher surveys conducted for the proposed project were all negative in both 2014 and 2017. Therefore, the canyon behind the Project site or other nearby canyons are unlikely to provide necessary habitat for coastal California gnatcatcher.
- I112-10** 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.

Comment Letter I113

Date: June 3, 2017

To: Laura Shinn, Director,
Facilities Planning, Design, & Construction
San Diego State University
San Diego, CA 92182-1624

From: Eleanor W. Lynch Ph.D.
Patrick J. Harrison, Ph.D.

Subject: Comments on the Draft Environmental Impact Report for the
SDSU New Student Housing Project, Release Date April 21, 2017

AS emeritus professors and neighbors, we support increased on-campus housing, SDSU's stated commitments to conservation and sustainability, and SDSU's strategic goal of improved community relations. With that support in mind, our comments on the DEIR for the SDSU New Student Housing Project follow. They describe our major concerns about the project and the process of its development. We look forward to the responses to each of these concerns.

Overall Issue

President Hirshman directed that the SDSU team "... 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" (May 8, 2017). Based on this promise, the development of Phases II and III will require significant alteration based on the DEIR documents and on significant and unavoidable impacts that exist but were not acknowledged in the DEIR. Because of the major changes that will be required, we assume that the NOP, DEIR, and final EIR process for Phases II and III will occur following the required revisions. However, our comments address all phases as described in the DEIR.

To fully comply with CEQA the existing DEIR must only be applied to Phase I where drawings, plans, and documents have been presented and viewed by the public. What steps and what processes will be used for Phases II and III of the proposed project?

Section 2.3 Project Background

Paragraph 5 and beyond discuss SDSU's commission of a Carrier Johnson study in 2013 titled the *West Campus Housing Site Master Plan and Program*. Though not discussed in the document, virtually the same renderings dated 2010 were created by another firm and have been available online until the last several weeks when they were abruptly removed from the website. In a PRA request following the release of the NOP, all campus master plans were requested. Significantly, none of the Campus Master Plans from 2008 through 2018 which

I113-1

I113-2

I113-3

were provided showed any development on the west side of Chapultepec or north into the canyon. The omission of intent to build on the proposed project site in all Master Plans or their components is a serious flaw in this DEIR and all others that have been approved between 2010 and 2018. Lacking the knowledge that SDSU has intended to build on the proposed site since 2010, reviewers of any and all Master Plans from 2010 forward have been based on false premises. Reviewers had no way to determine the scope of planned development and its related and cumulative impacts

SDSU must delay or nullify the current DEIR process because vital information regarding planned development west of Chapultepec along Remington Road and north into the canyon has never been disclosed on any Campus Master Plan or Master Plan component prior to the December, 2016, NOP for this project. Because of this lack of information, every subsequent development decision has been based on faulty premises related to environmental impact, land use, density, noise, traffic circulation, and other cumulative impacts.

An analysis of the Campus Master Plans provided for review under the PRA determined that the last SDSU Master Plan approved by the Board of Trustees received initial approval in May 2011, with approval of an amended EIR in May, 2014. It was brought to the Board of Trustees as part of the initial approval of the EIR for the Plaza Linda Verde Project. Approval can be found in the BOT minutes <https://www2.calstate.edu/csu-system/board-of-trustees/past-meetings/2014/Documents/july-22-2014-plenary.pdf>. In that Master Plan, no intent to build west of Chapultepec or north into the canyon was included. CEQA does not allow a piecemeal approach to development.

The DEIR should be nullified because adequate information of intent to develop land west of Chapultepec along Remington Road and north into the canyon was not provided in any Campus Master Plan or component of such a plan thereby creating a piecemeal approach to development.

Figure 4.1-12 Aesthetics Formatted Part 2 Pdf

This figure shows both Chapultepec and Phase II structures that front Remington Road on the wrong side of Remington Road. New structures appear to be shown on the south side when they are planned for the north side of Remington.

The location of the proposed buildings must be accurately displayed in future photos/renderings/drawing. This figure does, however, clearly depict the surrounding neighborhood and the inappropriate scale of Phases II and III. The massive scale is unacceptable according to President Hirshman's directive that the project "does not include significant and unavoidable impacts." Any final EIR eliminate Phase II and Phase III in the locations described in this DEIR.

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I113-4

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Figure 4.1-13 Aesthetics Formatted Part 2 Pdf

These before and after depictions clearly demonstrate significant, unavoidable impacts to the homes located on Hewlett Drive if built as described in this DEIR. Although not shown here, Hewlett Drive is not the only area within College View Estates that would be negatively impacted by buildings of this scale.



Existing Conditions - view looking southeast from Hewlett Drive to Chapultepec Residence Hall (approximately 5 miles away)



This location results in significant impacts to the surrounding community that are unavoidable if Phases II and III of the project are built as proposed in the DEIR. In keeping with President Hirshman's May 8, 2017, directive Phases II and III must be eliminated in this location in the final EIR. And

I113-6

changes in the plans for Phases II and III must be subject to the complete NOP, DEIR, and EIR process.

4.3 Biological Resources

In this section on birds (p 4.3-13), it is reported that no Coastal California Gnatcatchers were observed during four surveys in March and April 2017. Birds fly, and there are multiple, contiguous areas of coastal sage scrub in fingers of the canyon where the project is sited and in the extended canyon corridor. During the same time period that no gnatcatchers were reported by SDSU's Dudek contractors, at least one gnatcatcher was observed by Dudek biologists responsible for monitoring Southern Electric as they began trenching for undergrounding in College View Estates. Work had to be stopped on multiple occasions because the noise volume exceeded the <60db allowed required to protect the species from disturbance. The site may not have had gnatcatchers on the days the Dudek's SDSU team conducted surveys, but Dudek biologists working under another contract observed at least one in another part of the connected canyon.

Any final EIR must include continued monitoring on the project site throughout the nesting periods of Coastal California Gnatcatchers and other vulnerable species. Work stoppage must occur in any phase of the project when the noise of demolition, construction, or the aggregate noise of these and other campus activities exceed the allowable decibels or when any other type of intrusion on their habitat occurs.

Table 4.11-2. Measured Noise Level And Traffic Volumes

This table displays data from a study of existing noise levels from designated sites on Hewlett Drive Remington Road, and Chapultepec Convenience Store. The study was conducted on January 16, 2017.

These data from the study of existing noise are inadequate and cannot be accepted as accurate. The study was conducted on January 16, 2017, Martin Luther King, Jr. Day when SDSU was not in session and general traffic was lighter because of work closures. Studies of existing noise levels must be repeated on dates that are representative of typical conditions and continued monitoring be in place throughout all stages of demolition and construction of Phase I and any other Phase in the vicinity.

Section 4.14.26. Traffic p. 4.14-5

Data from a study conducted in Fall 2009 at Chapman University was used as comparative data related to daily trip generation by students. Chapman is a mid-sized university located downtown in Orange, California's Historic District within easy walking distance to retail and dining opportunities. The undergraduate population is 8,305. This project of 2,566 beds along with Chapultepec's 850 bed capacity accounts for 41% of all of Chapman's undergraduates. It is impossible

I113-6
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to draw adequate comparisons between daily trips made by Chapman students in the middle of abundant retail and dining options with those generated by SDSU students housed on the proposed project site.

Any final DEIR must account for the inadequacies in traffic studies related to projections of daily trips and conduct new studies that reflect actual traffic generated.

I113-9
Cont.

4.14.3.1 Existing Street Network p. 4.14-8 & onward

The description of Remington Road, one of the streets that will bear the greatest traffic burden is described as having bike lanes and prohibited parking. There are no assigned bike lanes, and street parking is by permit with variable hours of enforcement. The eastern end of Remington Road will be subject to significantly increased traffic from 55th Street west by students using the "backway" from campus to Montezuma. In fact, this is the preferred route when the Chapultepec address and an address west of campus are entered into many smart phone and other navigations systems. Additionally, Hewlett Drive south, College Gardens Court, Yerba Anita Way, Yerba Anita Drive, and Yerba Santa Drive south from Alvarado Estates will all become significantly impacted by traffic as well as weekend parking on residential streets. These streets were not taken into account in the traffic studies or the discussion of traffic impacts. Although not designated as a significant, unavoidable impact in the DEIR, traffic and parking meet both of those standards when accurately measured.

I113-10

Any final DEIR must include traffic studies that are conducted in real time at peak and non-peak hours, non-holidays, and days that students are on campus. They must also be done to include days and nights with major events in Viejas Arena, softball and baseball games, swim meets and water polo games. Studies must also include the neighborhood streets listed in the comment, and the number of cars parked on these streets.

4.14.5 Thresholds of Significance

No on-site traffic studies appear to have been done for the DEIR. As a result, data related to the frequent blockage of Remington Road, a city street, by student drop-offs and pick-ups, move-in and move-out days, stops at the Market store, delivery trucks, vendors, ride-sharing vehicles, and university vehicles were not examined. A study including over 15 hours of direct data collection examining Remington Road blockages in the servicing of Chapultepec Hall was conducted. Data demonstrate that there is already a significant impact on Remington Road due to parking in red zones, bicycle lanes, and traffic lanes. The curb cut required to comply with ADA standards is also frequently blocked. These problems exist without the addition of 2,566 additional students. Data from a direct study of Chapultepec's traffic and short-term parking needs show that the proposed mitigation is insufficient to accommodate 2,566 additional students and 8 buildings.

I113-11

The existing DEIR is inadequate in its assessment of traffic volume, flow, and management. Before approval of Phase I of the proposed project, adequate traffic studies must be conducted and the appropriate mitigations included. In any subsequent phase, additional traffic studies must be completed to include days and nights with major events in Viejas Arena, softball and baseball games, swim meets, and water polo games. Studies must also include traffic and parking impacts on the neighborhood streets listed in the comment under 4.14.3.1 Existing Street Network.

I113-11
Cont.

4.12.5 Impact Analysis p 4.12-11

This section of the DEIR states:

"No existing housing is located on the proposed project site, as such the project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. Further, the proposed project would introduce 2,566 new beds into the area, which would provide more housing for students (particularly, freshman students) at SDSU."

In portions of the DEIR and in all presentations of the development plans, SDSU has promoted the project as necessary to support the Sophomore Success Program. The above sentence contradicts the rationale for building the project.

Any final DEIR must clearly describe why the project is being developed and for whom. Is it for freshman or is it required to achieve the goals of the Sophomore Success Program or does it meet some other development goal of SDSU?

I113-12

Table 4.13-1 Fire-Rescue Department Stations Near the Project Area

Two of the three fire-rescue stations are not where the document says they are. Station 10 at 4805 62nd Street is in the Rolando Village area, not in Del Cerro. And the Fire-Rescue Department website does not mention that it has a Battalion Vehicle of Chemical Utility Rig. Station 31 on Camino Rico is not in Rolando but in Del Cerro. Although this may be a small error in a big document, it raises questions about SDSU's knowledge of critical community resources and surrounding neighborhoods in the event of a fire, accident, health emergency, or disaster.

Any final EIR must correct inaccuracies and misconceptions about critical fire-rescue resources and the adequacy of their capacity with the addition of up to 2700 additional beds.

I113-13

Table 4.13-2 2015/2016 Priority 1 Fire Service Calls from On-Campus Residences

Using data from a personal communication, the table displays the number of Priority 1 calls received from student housing in 2015 and 2016. At that time, 3,536 lived in student housing. Although the calls account for only 0.01 per student in each of the two years, increasing the number of students in on-campus housing by 42% to a total of 6,102 is likely to increase the number of calls exponentially. Data are not presented that examine the predicted rate of calls per capita as the number of students increases.

Predictions of the number of calls for fire-rescue services are inadequately supported in the DEIR. It cannot be assumed that the number of calls are additive. Any final DEIR must use established statistical procedures to calculate the predicted number of calls for fire-rescue services. It must also provide compelling evidence that rapidly increasing the number of students in on-campus housing by 42% when neither fire-rescue nor police services are currently meeting their targets for response times.

6.1 Alternatives

The discussion of the analysis of alternative sites is completely inadequate. CEQA demands that Alternative Location analyses be accurate and unbiased. Neither of these is true in the existing DEIR. The location rating system is opaque and does not even approximate a set of criteria and their measurement that could be replicated. Locations were eliminated because they would require a transaction between SDSU and Aztec Shops to transfer land --- an entity with the sole purpose of doing what SDSU needs to have done. Other locations would require the temporary dislocation of approximately 770 students and interfere with the Sophomore Success Program --- yet we learn earlier in the document that freshmen will be major beneficiaries of the project. We also know that students were relocated from residence halls being refurbished as recently as Spring Term 2017. There was also an extremely strong bias toward west campus to reduce the isolation of Chapultepec --- a problem created by poor decision-making recently and in the past when it, the Aquaplex, baseball and softball fields, tennis courts, Aztec Recreation Center, Viejas Arena, and the new intramural sports field were built. Many of those locations had considerable space that would have allowed for the necessary mitigation. Many still do. There are, however, still locations almost contiguous to Chapultepec that could be used to accomplish the goals of the project. A larger residence hall could be built in the parking lot east of Chapultepec; land currently occupied by the International Student Center which has several buildings with low structural value and an adjacent parking lot; land just west and north of the Aztec Recreation Center is buildable as is the land with the recently built intramural sports field. And, of course, the land on the 55th Street Peninsula is an excellent fit with the project goals. All of these are closer to classrooms, central campus, parking lots for student cars (yes, they will have them), the new retail and restaurant amenities at

I113-14

I113-15

Lindo Paseo and College. And none of them have significant, unavoidable impacts on the environment or the surrounding community.

Of even more interest is the land near central campus described on pages 3-4 and Figure 3-1, Cumulative Projects. Item 17 lists Adobe Falls Phase 1 as 48 townhome units on the eastern portion of the site in the planning stage scheduled for buildout 8/1/23. According to Figure 3-1 this site is in the heart of the campus. If 48 townhomes can be built there, there is certainly adequate space for the proposed project. Townhomes would be a far better fit for the west side of campus which is primarily residential, and an undisturbed canyon would be a wonderful feature for residents.

This DEIR is based on a wholly biased analysis of alternatives. All but Phase I* should be completely re-imagined using sites that are clearly available, have far fewer negative impacts on the environment, and are less costly to build upon. These sites still enable SDSU to meet the project goals.

**** The traffic problems described in other sections need to be addressed and mitigated in Phase I prior to the approval of this DEIR.***

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Cont.

I113-16

Response to Comment Letter I113

Eleanor W. Lynch and Patrick J. Harrison

June 3, 2017

- I113-1** The comment is an introduction to comments that follow. No further response is required.
- I113-2** The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, 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. Further, the Draft EIR was circulated for a 45-day public review period beginning April 21, 2017 and ending June 5, 2017. Because the Draft EIR does not contain significant new information, a new EIR or recirculation of the Draft EIR is not warranted.

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 proposed Project. As such, the Draft EIR identifies the impacts that would result with implementation of a Phase I and Phase II 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.

I113-3 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 the comment regarding Campus Master Plans, 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 comment regarding the scope of the environmental analysis, where applicable, the Draft EIR separately analyzed the potential environmental impacts resulting from each Phase of the proposed project. As such, the Draft EIR identifies the impacts that would result with implementation of a Phase I and Phase II project, with corresponding mitigation identified as necessary. However, following distribution of the Draft EIR and the close of the public comment period, the Project was modified in response to public comments to eliminate Phases II and III. 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. Please see Final EIR, Preface, for additional information regarding the project modifications. The remainder of 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.

I113-4 The comment states that the current SDSU Campus Master Plan does not provide adequate information of the university's intent to construct the Project in the proposed location, thereby creating piecemeal development. However, project approvals associated with the proposed New Student Housing project include approval of a new Campus Master Plan that includes the proposed student housing, which is illustrated in EIR Figure 2-14, Proposed Campus Master Plan. SDSU's intention to propose the New Student Housing project and prepare an EIR was noticed in the Notice of Preparation issued in December 2016; CEQA does not require further advance notice. As to the comment regarding piecemeal development, the comment expresses the opinion of the commentator and does not raise an issue specific to the 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.

I113-5 The commentator states that in Figure 4.1-12, Key Observation Point 2, Remington Road, existing Chapultepec Hall and proposed Phase II development are shown on the wrong side of Remington Road. Both the existing conditions photograph and the

visual simulation image depict Chapultepec Hall in its existing location. An existing photograph of the building taken from Key Observation Viewpoint 2 serves as the background image for the figure and the location of Chapultepec Hall has not been altered/moved in Figure 4.1-12. Similarly, the visual simulation included in Figure 4.1-12 includes the existing Key Observation Point 2 photograph as the background image and incorporates a true-scale 3-D model for the Phase II development that is rendered onto the existing photograph in its proposed location. In the visualization software, 3D cameras are positioned at Key Observation Points using GPS and are camera matched to existing topography. As a result, 3D models are rendered in true scale, real world coordinates. The key map included on the figure depicts the location of Chapultepec Hall, proposed Phase II development, and Remington Road. However, following distribution of the Draft EIR and the close of the public comment period, the Project was modified in response to public comments to eliminate Phases II and III. As a result, 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.

I113-6 The commentator expresses their opinion regarding the aesthetic impacts of proposed Phase II and Phase III development as viewed from Hewlett Drive and depicted on Figure 4.1-13. As stated in Chapter 4.1, at Key Observation Point 3 (Hewlett Drive), the tall, rectangular wings of Phase III residence towers and the form of the 14-story Phase II residential tower would create a high level of contrast in scale when viewed against existing residential development in the foreground of Figure 4.1-13. Phase II and Phase III development appear to reach into the obscured canyon that would buffer the proximate existing residential development. The buildings would be substantially taller than existing structures in the residential neighborhood and would dominate the view. As a result, impacts associated with Phase II and Phase III development were determined to be potentially significant. The commentator's opinions are generally consistent with the determination made in Chapter 4.1, Aesthetics, of the EIR. In Section 4.1.8 Level of Significance After Mitigation, the EIR determines that impacts to existing visual character and quality associated with Phase II and Phase III would be significant and unavoidable. However, 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. Please see Final EIR, Preface, for additional information regarding the project modifications.

I113-7 Please refer to response to comment O6 -119.

I113-8 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 attached to this response. 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. Complaints regarding on-site noise from stationary mechanical equipment should be directed to the University Police Dispatcher (Phone number: 619-594-1991), who will coordinate with the University Police. The University Police will respond and evaluate. They use the common criteria of "unreasonableness" to determine if any action is needed. 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.

I113-9 The comment questions the EIR's use of the Chapman University trip generation rate. While the neighborhood surrounding SDSU differs from that surrounding Chapman University, SDSU, like Chapman University, is located within easy walking distance of retail and dining opportunities. The fact that Chapman has a smaller student enrollment than SDSU and that the Project, in combination with the students residing in Chapultepec Hall, would include an amount of students equivalent to 41% of Chapman's enrollment is not relevant to the establishment of a student trip generation rate. For additional information responsive to this comment, please see the response to comment O-6-25.

I113-10 The comment questions the vehicle distribution route utilized in the EIR traffic impact analysis. However, the geographic distribution of vehicle trips generated by the 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. Specific to the College Gardens neighborhood referenced in the comment, based on the results of the SANDAG traffic model, the traffic engineer determined that two percent of Project traffic would access the Project site from the west, through the College Gardens area; thus, traffic through the College Gardens area was considered as part of the analysis. The Project traffic distribution, as derived through application of the SANDAG traffic model, is

illustrated on 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, and revised Figure 8-1.) For additional information responsive to this comment, please also see the responses to comments O-6-29 through O-6-32. Lastly, the traffic counts utilized for the traffic impact analysis were conducted when school was in session, and the traffic analysis properly addresses the Project's potential impacts during the peak hour periods (7:00-9:00 AM and 4:00-6:00 PM), which is when traffic volumes are highest, consistent with standard traffic engineering practice and City of San Diego and California State University thresholds.

- I113-11** The comment asserts that no “on-site” traffic studies appear to have been conducted for the EIR. The comment is incorrect as the EIR analysis assessed existing conditions within the study area, including Remington Road (EIR section 4.14.3), analyzed the Project's potential impacts on the study area roads, including Remington Road, under several scenarios (EIR section 4.14.6), assessed impacts relative to transit (EIR section 4.14.6.3) and parking, including College View Estates Spillover Parking (EIR section 4.14.6.4), and analyzed access and other issues specific to Remington Road (EIR section 4.14.6.5). Please also see the response to comment I-113-10 for additional information responsive to this comment. To the extent the comment expresses the opinions of the commentator, 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.
- I113-12** 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.
- I113-13** Thank you for this comment regarding Stations 10 and 31 locations and equipment and the incorrect information provided in the EIR Section 4.13 Public Services and Utilities. These revisions will be incorporated into the Final EIR. No further response is required.

Responses to Comments - Individuals

- I113-14** Table 4.13-9 in the EIR correctly applies the per capita call volume of 0.01 to the anticipated new student housing population of 2,566 students. The projected additional call volume is 26 calls per year, or one potential call every 14 days. Applying existing per capita call volumes are an accurate approach to projected call volumes for new development. This approach is commonly used in the fire industry to analyze the demand a project will have on a nearby fire station's and/or fire department's resources (personal communication with Michael Huff, San Diego County Fire Protection Planner, June 12, 2017).
- I113-15** 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.
- I113-16** 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.

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From: **Reser, Gregory** <greser@ucsd.edu>
Date: Sat, Jun 3, 2017 at 5:37 PM
Subject: Comments for SDSU New Student Housing Project Draft Environmental Impact Report (4/21/17)
To: "LShinn@mail.sdsu.edu" <LShinn@mail.sdsu.edu>, "TWhite@Calstate.edu" <TWhite@calstate.edu>, "TrusteeSecretariat@CalState.edu" <TrusteeSecretariat@calstate.edu>, "Presidents.Office@sdsu.edu" <Presidents.Office@sdsu.edu>, "PresOffi@mail.sdsu.edu" <PresOffi@mail.sdsu.edu>, "mcollins@mail.sdsu.edu" <mcollins@mail.sdsu.edu>

Greg Reser
5118 Bixel Dr.
San Diego, CA 92115
greser@ucsd.edu
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

SUBJECT: Comments for SDSU New Student Housing Project Draft Environmental Impact Report (4/21/17)

SDSU has identified many significant environmental impacts associated with the proposed student housing project, but rather than taking advantage of viable alternative sites, they deem the impacts to be unavoidable and wish to move forward with construction to the detriment of the surrounding environment. Additionally, there are impacts that SDSU glosses over or overlooks completely. Some instances of these are:

1. Increased illegal parking and lane blockage for passenger and commercial loading on Remington Road: SDSU proposes painting the curb red (already done by the City of San Diego in April 2017 with no effect) and adding new "no stopping" signs. Since the current no parking zone has not been enforced for years, there is no reason to believe it will be enforced after completion of the new dorms. SDSU proposes a dedicated pick-up/drop-off zone within the Project site as a solution, however specifics are not provided and the drawings show only an inadequately small vehicle loading zone in front of the building east of Chapultepec Hall. There is no loading zone proposed in front of Chapultepec or the much larger dorm to the west. Given the significant increase in dorm residents, illegal parking will certainly increase causing an unsafe situation for cyclists and motorists.

2. Increased traffic through College View Estates: SDSU did not conduct a study to confirm that the project would add less than 50 peak hour trips to the roads located in the College View Estates. Given the significant increase in dorm residents, not doing a

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Responses to Comments - Individuals

new study seems like a shortcut. Speaking of shortcuts, if you are on Remington Road and use a navigation app to find your way to Interstate 8 west, you will be guided through College View Estates to Montezuma Road. With the large increase in visitors and ridesharing services the new dorms will undoubtedly bring, a thorough traffic study needs to be done before claiming that there will be no impact.

3. Increased noise from outdoor living spaces: The proposed project would incorporate a park area overlooking the canyon and several patios intended as outdoor living spaces. These are very likely to increase noise, especially music, to nearby homes but this was not addressed at all in the EIR.

4. Unsubstantiated claim of reduced off-campus housing (mini-dorms): In their goals, SDSU claims the 2,700 additional dorm beds will reduce the demand for student housing in the adjacent neighborhoods but gives no evidence to support this. Since juniors and seniors will not be required to live on campus and students overwhelmingly say they prefer to live off-campus, there will likely be no decrease in mini-dorm residency. Also, a prominent College Area realtor and mini-dorm developer recently stated on nextdoor.com that he expects no decrease in the need for off-campus housing in the nearby single-family homes.

Sincerely,
Greg Reser

I114-3
Cont.

I114-4

I114-5

Response to Comment Letter I114

Greg Reser

June 3, 2017

- I114-1** The comment is an introduction to comments that follow. No further response is required.
- I114-2** The comment states that SDSU “glosses over” or overlooks completely lane blockage on Remington Road. However, EIR Section 4.14, Transportation/Circulation and Parking, addresses these Remington Road conditions in subsection 4.14.6.5, Access and Other Issues. The subsection addresses both traffic flow/congestion and parking violations, and notes that under existing conditions, drivers illegally stop their vehicles along Remington to either drop-off or pick-up students or deliveries despite the No Parking red curb. To alleviate this existing condition, the proposed project would provide dedicated off-street space for up to six vehicles in front of the new building on Remington Road, thereby removing the cars from the flow of traffic. Additionally, a dedicated move-in/move-out space would be provided on the north side of the new building, far removed from Remington Road, further alleviating congestion on that road. Please see Final EIR Project Description, Figure 2-11, for the location of these improvements. Additionally, under the proposed 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.
- I114-3** The comment states, incorrectly, that SDSU did not conduct a study to confirm that the Project would add less than 50 peak hour trips to the roads located in the College View Estates. The geographic distribution of vehicle trips generated by the 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 Road, 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 EIR Figure 4.14-3, Project Traffic Distribution. (See also Draft EIR p. 4.14-7, and Appendix K, Sections 3.0 and

Responses to Comments - Individuals

8.2, and revised Figure 8-1.) For additional information responsive to this comment, please also see the responses to comments O-6-29 through O-6-32.

- I114-4** 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.

- I114-5** 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 Letter I115

Jeff Katz
5483 Drover Drive
San Diego, CA 92115
jeff@jeffkatzarchitecture.com

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

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

Thank you for the opportunity to respond to SDSU's plans to build a new dorm complex on Remington Road. I have been a resident of College View Estates (CVE) for four years. As an Architect whose business is in the area, as well as a resident of CVE, 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 are not reasonable or satisfactory to me as a resident of the community.

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

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I115-2

I115-3

I115-4

Responses to Comments - Individuals

2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

I115-4
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.
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.
4. Alternative Site options that maintain the stated goals of "a distinct west campus housing neighborhood similar to ... the east side of campus" and Objective 2 requires "alleviate isolation of Chapultepec". There are multiple alternative site options that can support the construction of Phase 2 and 3, without building in the undeveloped canyon, including the area of the current International Student Center, the new Soccer field, or even the existing low rise apartments on 55th Street. All of these options will allow the construction of Phase 2/3 of the project, with minimal impact on existing operations, minimal cost for demolition and relocation and no disturbance to undeveloped canyon areas. Further analysis of alternative sites must be considered even if they are currently developed.
5. 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.
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.

I115-5

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Responses to Comments - Individuals

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.

I115-9
Cont.

7. 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.

I115-10

8. 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. Quoting from the SDSU Facility website regarding sustainability, *Campus sustainability encompasses a wide variety of efforts to steward the University's resources and reduce our environmental impact. Sustainability includes areas such as climate action, energy, water, waste reduction, transportation, food, green buildings, social responsibility, and academics. Efforts span from large capital projects to outreach efforts, engaging the campus to embrace and embody sustainability. Campus sustainability partners with all other areas of Facilities Services and entities across campus, including auxiliaries and academics.* In keeping with the University's expressed goal of sustainable development, the construction of the new housing in areas of the campus previously developed should clearly be the preferred alternative to constructing in the undeveloped canyon. 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.

I115-11

9. 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

I115-12

Responses to Comments - Individuals

2050. It is insufficient and biased for SDSU to use a building and construction standard of "unusual" levels of energy consumption.

↑ I115-12
Cont.

10. 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.

I115-13

11. 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.

I115-14

12. SDSU must mitigate traffic impacts even in the event Phase 1 only moves forward. Given the current traffic drop off and delivery nightmare that exists on Remington Road with only the existing Chapultepec dorm, the addition of even a minimum Phase 1 will create unreasonable hazards on Remington Road – a City owned and not university owned street. Without proper drop off and delivery area the current situation of blocking bike lanes, parking on the sidewalk, and blocking travel lanes will only be exacerbated. The current proposed turn out lane can only accommodate 6-8 cars. On any given day today there are 6-8 cars pulled up alongside the existing dorms. Adding 850+ beds will certainly create more vehicle traffic in the area with deliveries, Uber/Lyft, personal vehicles, etc. Any final design for this project, even if only for Phase 1 must include significant off-road improvements to accommodate the reality of vehicle traffic serving these additional beds without adding to the congestion that exists today on Remington Road.

I115-15

13. SDSU must analyze the cost impacts of their proposed solutions and look for more cost effective alternatives. While detailed cost estimates are not a part of the DEIR, in my many years of experience with public sector projects involving construction on steeply sloping sites, the cost of constructing in the canyon, including retaining walls, grading, shoring, deepened foundation systems, utilities and storm water treatment, would far exceed the cost of constructing on previously developed sites, even when including the cost of demolition, and/or relocation. A thorough alternatives analysis would need to include a detailed cost evaluation of the proposed and alternative sites as well.

I115-16

14. Geologic Impacts and mitigation measures need to be further analyzed to understand the project impacts. Mitigation measures MM-GEO-1 and -2 require further analysis be done prior to

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Responses to Comments - Individuals

development. The potential impacts of the results of this further analysis must be taken into consideration as part of the CEQA process. For example, the note to remove and replace fill soils could require the removal of "9-40 feet of fill" in the area of the existing parking lot and up to 30 feet elsewhere adjacent to the canyon. The cumulative impacts of the removal and replacement of this material has not be analyzed with respect to construction noise or air quality or cost impact to the project. Further, basing project requirements on a nearly 30 year old (Woodward-Clyde 1988) report is unsatisfactory for a project of this magnitude. Given the changes in structural design requirements in the last 30 years, and a cursory updated report which includes only minimal additional borings, and the potential impact to the project necessitates a project specific geotechnical investigation be done prior to completion of the EIR in order to verify that the proposed mitigation measures don't create other non-mitigable impacts.

I115-17
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15. SDSU must address the Aesthetic impacts of the proposed project. By its own review, the impact of Phases 2 and 3 of the project will have "Potential Impacts" to the scale and character of the canyon and surrounding single family residences. The use of the word "potential impact" is absurd, given the visual simulations provided within the report which clearly show the new structures dwarfing the existing neighborhood. Given the size of the development, the report rightly concludes that trees or other measures to reduce the visual impact would not be effective and the only potential mitigation is to redesign Phase 2 and 3. This redesign must be considered. As an aside, the comment that the buildings *"As shown in the architectural renderings, the new structures would be architecturally consistent with the Spanish Colonial and Mission Revival styles of the original SDSU campus buildings"* is an affront to architects and architectural historians everywhere. The proposed buildings are "Las Vegas Modern" at best and have no relationship to the beautiful traditional architecture, either in scale or detail, of the early campus buildings referenced.

I115-18

Sincerely,

Jeff Katz

CC: TWhite@Calstate.edu, TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu,
PresOffi@mail.sdsu.edu, mcollins@mail.sdsu.edu

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Response to Comment Letter I115

Jeff Katz
June 3, 2017

- I115-1** The comment is an introduction to comments that follow. No further response is required.
- I115-2** The comment that the EIR is “insufficient” and that there are “feasible alternatives” 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.
- I115-3** The comment is an introduction to comments that follow. No further response is required.
- I115-4** 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 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.
- I115-5** The comment that SDSU must conduct “an unbiased environmental analysis” addresses general subject areas, which received extensive analysis in the EIR. The comment is also 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..
- I115-6** See response I115-5.

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- I115-7** Please see the Alternatives Thematic Response for information responsive to this comment.
- I115-8** Please see the Alternatives Thematic Response for information responsive to this comment.
- I115-9** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I115-10** Please see the Biological Resources Thematic Response for information responsive to this comment.
- I115-11** 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, since release of the 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.
- I115-12** 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 Chapters 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.

I115-13 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 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 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. 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

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 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.

- I115-14** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. As previously noted, the proposed project has been modified and no longer includes Phases II or III. As a result, because the proposed project no longer includes Phase III, there will be no significant and unavoidable traffic impacts. 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.

I115-15 The comment addresses mitigation of traffic impacts relating to existing conditions on Remington Road. However, the EIR determined that the proposed project would not result in significant impacts on Remington and, therefore, no mitigation is required. Nonetheless, the proposed project includes substantial project features that would improve the existing conditions. The Project includes off-street pull-off areas on Remington in front of the new building 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. (Please see Final EIR, Project Description, Figure 2-11, for depiction of the pick-up/drop-off and move-in/move-out areas. See also EIR Section 4.14, subsection 4.14.6.5, Access and Other Issues.) 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.

I115-16 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.

I115-17 With respect to construction noise, this issue is addressed by phase in Section 4.11.6, Impacts Analysis (page 4.11-11 of the EIR).

With respect to air quality impacts, grading estimates were included in the air quality/greenhouse gas/energy modeling for the project. (SDSU, please confirm that mass grading, including removal and replacement of up to 40 feet of existing fill, was included in the data provided to Dudek’s air quality specialists.)

With respect to using the 30-year old Woodward-Clyde report as a basis for project requirements, MM-GEO-1 (page 4.6-20 of the EIR), completion of a final geotechnical investigation specific to the preliminary design of the proposed development, would ensure that geotechnical engineering for the project would be completed in accordance with current industry standards.

With respect to potential deferred mitigation, under CEQA (Section 15126.4(b), *Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects*) it is legally defensible to provide mitigation measures that mandate completion of standard, final geotechnical reports if it can be reasonably assumed that the conclusions and recommendations of that standard report will be consistent with the preliminary geotechnical report and no new geologic impacts would occur. In this case, such an assumption is reasonable, from the perspective of a Dudek California Certified Engineering Geologist. Completion of a standard, final geotechnical investigation would constitute performance standards that would mitigate the significant effect of the project. For that reason, no further response to this comment is provided.

- I115-18** The bulk, scale, and architectural character of the Project is analyzed in Section 4.1, Aesthetics, of the EIR. In subsection 4.1.8, Level of Significance After Mitigation, the EIR determines that impacts to existing visual character and quality associated with Phase II and Phase III would be significant and unavoidable due in part to anticipated high levels of contrast in scale when viewed against existing residential development (see Figures 4.1-13). Section 4.1 also states that from Hewlett Drive, the Phase II and Phase III buildings would be substantially taller than existing structures in the area and would dominate the view. However, following distribution of the Draft EIR and the close of the public comment period, the Project was modified in response to public comments to eliminate Phases II and III. 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. Please see Final EIR, Preface, for additional information regarding the project modifications.

Shading and shadow impacts of the Project are also addressed in Section 4.1 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.

Responses to Comments - Individuals

Comment Letter I116

From: **Roger Newell** <rgnewell@cox.net>
Date: Sat, Jun 3, 2017 at 6:31 AM
Subject: We Need More Student Housing
To: Ishinn@mail.sdsu.edu

I could take the new dorm planners around the campus and show them many places that would be better suited to building new dorms.

On example would be to raze the brick dorms east of College and South off Montezuma like the ones that were razed to build the new ball fields, Aquaplex, and tennis courts. I have pictures of this process.

I wonder if environment law requires parking for new housing? Maybe you know. I will also research it as the current proposal provides none.

Regards,

Roger Newell
5115 Walsh Way
San Diego, CA 92115
[619-287-3223](tel:619-287-3223)

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I116-3

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Response to Comment Letter I116

Roger Newell

June 3, 2017

- I116-1** 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.
- I116-2** 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.
- I116-3** 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 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.

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Responses to Comments - Individuals

Comment Letter I117

Mark Nelson
5417 Hewlett Drive
San Diego, CA 92115
menelson@gmail.com

June 3, 2017

Laura Shinn
San Diego State University
LShinn@mail.sdsu.edu

SUBJECT: Nature Conservancy Member Opposition to the SDSU DEIR (4/21/17)

I am a member of the Nature Conservancy. As a member, I assert that SDSUs planned West Campus housing project and associated DEIR (4/21/17) are antithetical to the mission of the Nature Conservancy. In brief, the mission of the Nature Conservancy is:

"Protecting nature, for people today and future generations.

The mission of The Nature Conservancy is to conserve the lands and waters on which all life depends.

Our vision is a world where the diversity of life thrives, and people act to conserve nature for its own sake and its ability to fulfill our needs and enrich our lives."

SDSUs DEIR does not meet the mission of the Nature Conservancy

SDSUs DEIR targets destruction of Aztec Canyon through biased project objectives, such as exploiting undeveloped land and does not conserve land

SDSUs DEIR plans to make non-mitigatable, irreversible, significant impacts to Aztec Canyon that deprives future generations of that land.

SDSUs DEIR fails to recognize the State of California's explicit commitment to Aztec Canyon, as carefully explained in the San Diego County Sierra Club's comments, and as a result, does NOTHING to conserve nature.

In short, SDSUs DEIR does not comply with CEQA, it does not comply with a major university's obligation to the community and the environment, and it does not comply with my understanding of the goals and mission of the Nature Conservancy.

Sincerely,

Mark Nelson

I117-1

I117-2

I117-3

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Response to Comment Letter I117

Mark Nelson

June 3, 2017

- I117-1** The comment is an introduction to comments that follow and asserts that the proposed project is “antithetical to the mission of the Nature Conservancy.” The comment expresses the opinions of the commentator and does not raise an issue specific to the EIR or its analysis. No further response can be provided or is required.
- I117-2** The comment makes several claims regarding the EIR as related to Aztec Canyon. To the extent the comment is addressing the impacts that would have resulted with implementation of project Phases II and III, the proposed project was modified following public comment and no longer includes Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modification. Please also see the Biological Resources Thematic Response, which explains that all remaining significant impacts would be mitigated to less than significant. Beyond that, 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.
- I117-3** The comment asserts that the EIR does not comply with CEQA. 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.

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Responses to Comments - Individuals

Comment Letter 118

Mark Nelson
5417 Hewlett Drive
San Diego, CA 92115
menelson@gmail.com

June 3, 2017

Laura Shinn
San Diego State University
LShinn@mail.sdsu.edu

SUBJECT: DEIR Comment – Online Petition Comments Against SDSUs Canyon Destruction

What follows are 8 pages of verbatim comments from the online petition disapproving of SDSUs behavior:



A disgrace. SDSU should be ashamed of itself

A university destroying a canyon...the irony is palpable.

All you want is money. You don't care about the aesthetics and nature of our community. STOP

BUILDING THESE DORMS!!! Parking and traffic in the College Area is HORRENDOUS as it is!

I 118-1

I 118-2

I 118-3

I 118-4

Responses to Comments - Individuals

almost 50 year home owner. This is disgraceful...especially to have this revealed after having it planned since 2010! Shame on SDSU!

↑ I118-4
Cont.

Be a good neighbor. There are other properties you own that could be just as efficient for your goals.

I I118-5

Beautiful canyons are a large part of what makes San Diego so wonderful. Please don't destroy any of them!

I I118-6

Better locations on campus that are less expensive with better services for students.

I I118-7

Build on existing structures not natural areas!

I I118-8

Building several dorms right on top of a neighborhood in an open space will ruin the neighborhood, decrease property values and impact quality of life for all negatively. Save the canyon and don't ruin our neighborhood.

I I118-9

Canyons are critical and precious in an urban area. Do not destroy our canyons! Keep your promises to the community.

I I118-10

Cramping 2700 beds next to our single-family neighborhood and claiming it will have no impact on traffic or parking is bananas. SDSU needs a long-term solution to its space constraints as it pursues ever-increasing enrollments. While our community wants more dorms (and not mini-dorms), this proposal is flawed on so many levels.

I I118-11

Do not build in this sensitive area! This is just wrong for every reason. Destruction of environment here, so rare, in the city, just stop, please!

I I118-1

Don't destroy nature!

I I118-12

Don't do it!

I I118-13

Don't let them sneak in phase 3 with phase 1. Phase 3 is reported to have a major negative impact on the environment. Tear up a parking lot, not our canyon!

I I118-14

Don't like the idea of more dorms on a beautiful canyon.

I I118-15

Enough is enough. We need to preserve our canyons, plants and trees.

I I118-16

Find other existing buildings nearby, rehab them and add plenty of shuttles to bring students back and forth. The canyons should never be touched. Don't turn San Diego into L.A.

I I118-17

I am signing this petition to support my friends and neighbors who live in the area affected by this absurd idea the university has. I trust they will act responsibly and with integrity in finding a solution that is respectful to the residents of their surrounding neighborhoods.

I I118-18

I am strongly against the building of these dorms in this location.

I I118-19

I cannot support this environmentally damaging project.

I I118-20

I do not agree with SDSU housing because SDSU will destroy the nature and clean air and cause more traffics

I I118-21

I feel there are better approaches to provide housing for students, preserve canyon lands, and work with the existing community.

I I118-22

Responses to Comments - Individuals

I protest the whole idea of all the new dorms being built on the west side of the campus!	I 1118-23
I received my M.A. from SDSU in 1993. As an Aztec, I am opposed to constructing twin 14 story dorms in the pristine Aztec Canyon.	I 1118-24
I support building new student dorms on campus but not on the canyon. There are many other options on campus that would better serve the students. Please do not build on the canyons.	I 1118-25
I support building new student housing on campus. But the canyon is a poor location for several reasons, while there are several good locations elsewhere on campus.	I 1118-26
I walk passed Aztec canyon every morning walking my dog. I enjoy the beautiful natural landscape and fauna. I cannot understand why this location was chosen for 15 buildings 15 stories high. There are so many places near by on campus that are not natural or pristine, that would be a better fit. Be a good neighbor and leave this buffer between the single family homes and dorm buildings. (existing or new)	I 1118-27
If there is a option to building dorms in a canyon; then please do so. Destroying a canyon changes the face of San Diego for generations to come.	I 1118-28
I'm a native San Diegan who grew up around SDSU and attended classes here. Please leave the canyons pristine. Build student housing elsewhere. San Diego is becoming LA. Keep it beautiful!	I 1118-29
I'm very supportive of new dorms for students at SDSU. But building a sky-scraper next to single family homes is outrageous.	I 1118-30
Interesting that a plan, unmentioned in any SDSU Master Plan, is depicted in a landlab rendering in 2010 but only shared with the community in mid-December, 2016. On-campus housing is important, but there are other sites (identified by SDSU) that could accommodate their needs without the dramatic environmental impacts of the proposed project.	I 1118-31
Irony of a University destroying the environment and not being a good neighbor	I 1118-32
It is shameful to start the long slide into our last vestige of wild areas in San Diego. It is my understanding that back in the 70's the canyon ecosystems were protected by the City of San Diego.	I 1118-33
Once start the process of ruining our canyons, other developers will try and follow. It's not the job of the University to provide housing. Stop turning education into a business. This is	I 1118-34
just a continuation of the SDSU monopoly. Spend all the tax dollars on things other than education, then tell tax payers you need more tax dollars to keep the school doors open.	I 1118-35
Keep open space	I 1118-36
Keep with the General Plan. Leave open space, open. We don't need even more crime and traffic. Enough is enough.	I 1118-37
Let's not destroy any more of nature!	I 1118-38
Lets not overdevelop at the expense of our natural environment	I 1118-39

Responses to Comments - Individuals

More student housing is needed on campus, but building a 14 story building in a protected habitat is not the way to do it. They also have not addressed the impact on area traffic and safety.

I 1118-40

Never should build in such a scenic place like this.

I 1118-41

No dorm in canyon

I 1118-42

No more overcrowding in our area..!! SDSU needs to choose another site

I 1118-43

No to building in canyon

I 1118-44

No to the dorms. Protect the canyons

I 1118-45

Not a good plan for the community, AT ALL !!!

I 1118-46

On campus housing/dorms is so ridiculously expensive, to force second year students to pay it is irresponsible and disgusting.

I 1118-47

Other more appropriate solutions that are less disruptive to the neighboring community need to be examined. Alternatives exist that would not necessitate the incursion into the canyon that this solution proposes. Besides the native plant community and habitat that this canyon contains, it is a perfect buffer between the development of the campus and the surrounding single family community.

I 1118-48

Our backyard is the canyon ,stop this SDSU !!

I 1118-49

Our natural habitats are precious and should be preserved.

I 1118-50

Place the dorms within the footprint of SDSU, not in the canyons!

I 1118-51

Please do not build here. I like the natural space and the traffic is bad enough as it is.

I 1118-52

Please do not destroy our canyons. It is unnecessary. There are other alternatives.

I 1118-53

Please don't build in the canyon. We all need to keep the natural landscape.

I 1118-54

Please don't build that large dorm. The canyon and the animals that live there will be destroyed. You can never reverse the damage you will be causing. When the way we deliver higher education is changing at warp speed, you may be building a dorm that will Be outdated before it's completed.

I 1118-55

More online classes, cutting more costs so students can afford a college degree. Just not smart.

I 1118-56

Please don't destroy this beautiful canyon. Not a very good example for your students. I know there are other options!!!!

I 1118-57

Please DON'T ruin our beautiful canyon!! My husband and I have lived in CVE for over 15 years and have 2 young children. All of the college noise/traffic congestion, destruction of our beautiful canyon is going to take away from our feeling of family community. We love our college kids in CVE, but this is TOO MUCH. There are other places on SDSU's land where they could build this addition housing and if SDSU wants kids to have the campus experience, they won't get it being so far out on the perimeter of the campus. Makes no sense.

I 1118-58

Responses to Comments - Individuals

Please help save the SDSU canyon natural resource and ecosystems against the mindless expansion of the SDSU campus.	I 1118-59
Please let's protect the beautiful canyons. Can't imagine what this could do to the residents.	I 1118-60
Please save our neighborhood canyon from being developed into SDSU dorms!	I 1118-61
Please save our SDSU canyon. We were promised many years ago that new housing would be built on the east side of the campus and sports facilities would be on the west side of the campus. The proposed housing violates this promise. The canyon is pristine, home to many endangered species, and home to many rare plants. There are many places where new dorms could be built on the east side. Please don't allow the canyon to be destroyed, and please don't let those who live and own housing near the canyon find their homes in the midst of congestion, construction, and no privacy.	I 1118-62
Please save the canyons and keep our environment from being over crowded.	I 1118-63
Please save this canyon! I've lived in CVE off & on my whole life and would love to see the canyon remain as it has throughout the years.	I 1118-64
PLEASE, DON'T DESTROY ANOTHER CANYON.	I 1118-65
Please, no more construction in our beautiful canyons. Build in an area that is already developed and allow our few remaining wild animals and birds some peaceful habitats. Thank you so much from a SDSU alumni, 1973.	I 1118-66
Preserve canyon land for current and future generations.	I 1118-67
Preserve the canyon	I 1118-68
Preserve what can still be preserved.	I 1118-69
Rediculous! !!!	I 1118-70
Remove the student soccer field and build it there with connections to campus and an existing parking structure. A bad traffic plan with arena events to get worse.	I 1118-71
Responsible development please SDSU!!!!	I 1118-72
Save our canyon!	I 1118-73
Save our canyons. SOC.	I 1118-74
Save our canyons...build elsewhere!	I 1118-75
Save our ecosystem!!	I 1118-76
Save the canyon	I 1118-77
Save the canyon and the community!	I 1118-78
Save the canyon!	I 1118-79
Save the canyon!	I 1118-1

Responses to Comments - Individuals

Save the canyon!	I 1118-80
SAVE THE CANYON!	I 1118-81
Save the canyon!!	I 1118-82
Saving the open space is beneficial on many levels. Please consider this. Thank you.	I 1118-83
School is "all pervasive" enough!	I 1118-84
SDSU contain your growth, or rebuild old dorms, stop encroaching on neighborhoods and the areas that make them worth living in!	I 1118-85
SDSU grad here - 2700 beds is not a "community" as SDSU claims it wants to create for the sophomores. Use the 14 other sites ID'ed and discarded in the EIR to create smaller dorms where the students living in them will get to know each other and create life long relationships.	I 1118-86
SDSU has identified 14 other possible building sites! Why destroy the canyon? SDSU should be ashamed and those with oversight of the state university system should take notice and prevent this!	I 1118-87
SDSU is big enough already especially with all the huge new buildings they have recently constructed.	I 1118-88
SDSU needs to slow down a bit and catch their breath. Leave the native vegetation alone for Pete's sake as there's such a little bit of it left.	I 1118-89
SDSU needs student housing. However it does not need to build in a canyon. I urge SDSU to be a responsible steward of it's canyon spaces and build housing for students on the alternate sites noted in the EIR	I 1118-90
SDSU needs to be a good neighbor and be open and transparent with their Master Planning efforts. These buildings are poorly designed, planned and located on the campus. Out of scale next to single family neighborhood. The canyon needs to remain for a campus buffer.	I 1118-91
SDSU needs to follow the same laws....they are not above the law. The City of San Diego needs to enforce the laws....not roll over for SDSU!	I 1118-92
SDSU needs to stay on the south side of I-8 and not able able to take any of the Qualcomm stadium property either. And we especially dont need a huge dorm in our canyons. Has no one thought about the micro environments and the critters living in them. Why should our neighborhood be ruined by more young folks and their cavalier lifestyles while attending school? SDSU should concentrate on developing more in their current location We do not need an influx of more traffic and possibly safety issues in our neighborhoods!	I 1118-93
SDSU should grow inside and east side of the campus where there are many sites available and listen to the community and neighbors.	I 1118-94
SDSU...Bad environmental planning, bad neighbor	I 1118-95
SDSU: Too big to not fail!!	I 1118-96
Shame on SDSU for failing to put the environment first!	I 1118-97

Responses to Comments - Individuals

Someone had the foresight to preserve the canyon, Let's be respectful of that and save the natural places for our next generations.

I 1118-98

Something this massive belongs closer to the center of the campus or possibly at the Qualcomm site if it is acquired. It should not be located adjacent to single family residences. The land along this portion of Remington Rd should be utilized as a low intensity buffer between the campus and the single family neighborhood.

I 1118-99

STOP ALREADY!!!!

I 1118-100

Stop the crazy building!!!!

I 1118-101

Stop this monster of a project! Destroying the neighborhood and the environment!

I 1118-102

Student housing, particularly high-rise buildings (Phase 2 & 3) do NOT belong in residential neighborhoods, particularly if there are other places where they can be located (Qualcomm?).

I 1118-103

Sustainability starts here SDSU!

I 1118-104

The canyons are beautiful

I 1118-105

The canyons of SD have always been one of the most important and unique features of our city. It would be a tragic decision to destroy/compromise them.

I 1118-106

The DEIR shows potentially significant environmental impacts to the canyons. SDSU needs to find more sustainable alternatives on the campus where available space is underutilized for new student housing.

I 1118-107

The extra traffic on Remington Street will make it almost impossible to exit and enter our neighbor, not to mention the extra noise.

I 1118-108

There are alternative solutions despite what SDSU says.

I 1118-109

There are many other sites for dorms without destroying the canyon or a neighborhood.

I 1118-110

There are other locations to choose from that won't result in habitat destruction for endangered plants and animals. Respect our earth and protect what little natural resources we have left!

I 1118-111

There are plenty of other locations that exist they can do this in.

I 1118-112

There is plenty of other sdsu property which could easily be used for such a lg bldg w/o destroying the fragile canyon ecosystem and missing off the community nearby. We already have to deal with the campus parties, traffic, noise, bright lights, minidorms, and other intrusions to our lives. Please reconsider.

I 1118-113

There's no reason to destroy the canyon. Keep it for future generations. Put the dorms ON CAMPUS!

I 1118-114

They just want money... they're sick. Making sophomores live on campus means they prefer non-locals which is not fair to SD residents!! They just want money!!!

I 1118-115

This canyon is beautiful, and there other, better options.

I 1118-116

Responses to Comments - Individuals

This is ENOUGH with SDSU being disrespectful to the surrounding neighborhoods. We have tried to support and collaborate with the university, and every time they give us a punch in our backs.

I 1118-117

This is literally unnecessary; it'll destroy what little natural environment we have left, squeeze more money out of college students, will create even more traffic around campus and the surrounding neighborhoods and areas, and it won't even look nice.

I 1118-118

This is ridiculous!

I 1118-119

This is so urgent for our community. While we support SDSU's goal of more on campus housing, this specific location would destroy our canyon and damage our community. Please help our community effort.

I 1118-120

This is unnecessary growth. There are plenty of other solutions that will satisfy SDSU needs and not destroy community open space.

I 1118-121

This megadorm should never be considered since the canyon is such a high risk area for a fire disaster.

I 1118-122

This needs to be stopped! SDSU has no regard for its' neighbors or the environment!

I 1118-123

This plan is outrageous. Destroying San Diego's natural canyons/habitat/views to build skyscraper dorms when SDSU has several other property location options is unjustifiable.

I 1118-124

This project is ill- conceived considering so many other possible options for building these dorms. It will totally change our neighborhood for the worse.

I 1118-125

This project quadruples the number of beds and while tearing out the existing parking with no replacement. SDSU claims they offer a city planning degree, but this proposal seriously undermines any credibility such a program could have.

I 1118-126

This should've been on change.org but oh well. SDSU doesn't have many trees and that's why the campus is ugly. Look at UCSD, then look at SDSU, tell me there isn't a difference in aesthetical quality.

I 1118-127

This will not only destroy my view but endangers the wildlife in the canyon! Build somewhere else!

I 1118-128

This would be a terrible impact on the college view estates neighborhood. Please explore the many other options!

I 1118-129

This would severely impact the neighborhood I live in.

I 1118-130

To destroy the balance of nature is suicide to those who live within it.

I 1118-131

Traffic is already very bad with 5 stop lights on 55th to Remington just to get home. No to this project.

I 1118-132

Truly a shame that the leadership of an institution of higher learning in California is behaving in this manner. Destroying a beautiful wild area with protected wildlife in order to increase the number of people living in an extremely small footprint with little regard to existing residents and infrastructure is unconscionable. There are other locations on SDSU campus that can and should be used to build the needed student resident housing. Many of the "mitigations" in the EIR created by SDSU don't address the current issues along Remington Road, let alone the impact of the additional 2700 proposed new residents.

I 1118-133

Responses to Comments - Individuals

Use our canyon land? Surely SDSU owns land that will not ruin the natural environment of our city/county?	I 1118-134
Very sad that SDSU does not take the homeowners into consideration for their GIGANTIC project. How would the powers that be like it in their neighborhood.	I 1118-135
We are proud supporters of SDSU but this building plan is a socially irresponsible plan - environmentally and as a neighbor	I 1118-136
We do not need these buildings in our residential neighborhood . Use the property below in those dumpy apartments that should be torn down anyway	I 1118-137
We don't need any more dorm buildings. SDSU can't fill the ones they already have.	I 1118-138
We don't need more dorms. We need more natural spaces and to respect the wildlife already living in the area. Please don't destroy this natural habitat.	I 1118-139
We encourage SDSU to create housing opportunities for students who want to live in a "campus community." However, the canyons are not the place for these buildings to be built. There are several current housing locations that are under-utilized - the Maya & Olmeca halls are on the east side of campus. They are the old school brick buildings that are three-stories high and house only 220 residents. Tear these down and create tall modern dorm rooms here!	I 1118-140
We lose our beloved canyons when there are parking lots and rec fields on campus that could be used for this?? It doesn't make sense!	I 1118-141
We only get one chance to preserve our canyon/natural habitat. Growth, density and development are inevitable but there are many things that can be done with design and good planning without destroying our natural surroundings. What audacity to select a site that inflicts maximum pain on the adjoining neighborhood while destroying a natural canyon, all at much greater expense than any of a dozen alternative sites on campus.	I 1118-142
When there are other areas on campus where a dorm could be built, there is no reason to build in the canyon. The cost alone to build on the site alone doesn't make sense, and more important, the damage to the canyon's ecosystem and wildlife would be permanent. In a time when our wild areas are under attack we must strongly consider saving this canyon, its wildlife, and its natural beauty for all.	I 1118-143
Why are they ruining the natural environment when there are other suitable areas to construct this monstrosity?	I 1118-144
Why don't you focus more on how to improve our education and create smaller classes instead of being money hungry and focusing on screwing over your students	I 1118-145
With all the blight on El Cajon Blvd., within bus lines and walking distance of SDSU, it is possible to build the dorm elsewhere without destroying green space!	I 1118-146

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Response to Comment Letter I118

**Online Petition Comments Against SDSUs Canyon Destruction
Mark Nelson**

- I118-1** As noted above, the submitted comments are from an online petition disapproving of the proposed project's impacts relative to the nearby canyon, though the comments are not specific to the Draft EIR or its analysis. As such, the comments address general subject areas, which received extensive analysis in the EIR, although they do not raise any specific issue regarding that analysis. For that reason, no more specific responses can be provided or are required. The comments will all be included as part of the record and made available to the decision makers prior to a final decision on the Project. It is noted, however, that following the close of the Draft EIR public comment period, the proposed project was modified and no longer includes Phases II and III. As a result, the proposed project would not result in any direct impacts to the canyon, and any remaining potential impacts would be indirect and fully mitigated.
- I118-2** 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.
- I118-3** 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.
- I118-4** 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.
- I118-5** 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.
- I118-6** 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.

Responses to Comments - Individuals

- I118-7** 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.
- I118-8** 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.
- I118-9** 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.
- I118-10** 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.
- I118-11** The comment addresses general subject areas, which received extensive analysis in the EIR. The Project's impacts relative traffic and 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.
- I118-12** 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.
- I118-13** 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.

Responses to Comments - Individuals

- I118-14** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-15** 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.
- I118-16** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-17** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-18** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-19** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-20** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-21** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-22** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-23** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.

Responses to Comments - Individuals

- I118-24** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-25** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-26** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-27** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-28** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-29** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-30** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-31** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-32** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-33** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-34** 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.

Responses to Comments - Individuals

- I118-35** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-36** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-37** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-38** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-39** 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.
- I118-40** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-41** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-42** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-43** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
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Responses to Comments - Individuals

- I118-45** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-46** 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.
- I118-47** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-48** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-49** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-50** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
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Responses to Comments - Individuals

- I118-56** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-57** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
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- I118-59** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-60** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-61** 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.
- I118-62** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-63** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
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Responses to Comments - Individuals

- I118-66** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-67** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-68** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-69** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-70** 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.
- I118-71** 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 EIR. For that reason, no further response to this comment is provided.
- I118-72** 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 EIR. For that reason, no further response to this comment is provided.
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Responses to Comments - Individuals

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- I118-78** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-79** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
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- I118-82** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
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- I118-86** 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.
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Responses to Comments - Individuals

- I118-88** 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.
- I118-89** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
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- I118-92** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-93** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
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- I118-96** 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.
- I118-97** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-98** 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.

Responses to Comments - Individuals

- I118-99** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-100** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-101** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-102** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-103** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-104** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-105** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-106** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-107** 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.
- I118-108** 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.
- I118-109** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.

Responses to Comments - Individuals

- I118-110** 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, as previously noted, 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.
- I118-111** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-112** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-113** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-114** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-115** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-116** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-117** 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.
- I118-118** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.

Responses to Comments - Individuals

- I118-119** 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.
- I118-120** 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.
- I118-121** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-122** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-123** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-124** 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.
- I118-125** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-126** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-127** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-128** 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.

Responses to Comments - Individuals

- I118-129** 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.
- I118-130** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-131** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-132** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-133** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-134** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-135** 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.
- I118-136** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-137** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-138** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.

Responses to Comments - Individuals

- I118-139** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-140** 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.
- I118-141** 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.
- I118-142** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-143** 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.
- I118-144** 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.
- I118-145** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-146** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I118-147** 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.
- I118-148** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.

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Responses to Comments - Individuals

Comment Letter I119

Mark Nelson
5417 Hewlett Drive
San Diego, CA 92115
menelson@gmail.com

June 3, 2017

Laura Shinn
San Diego State University
LShinn@mail.sdsu.edu

SUBJECT: Natural Resources Defense Council Member Opposition to the SDSU DEIR (4/21/17)

I am a member of NRDC. As a member, I assert that SDSUs planned West Campus housing project and associated DEIR (4/21/17) are antithetical to the mission of the NRDC. In brief, the mission of the NRDC is:

"NRDC works to safeguard the earth—its people, its plants and animals, and the natural systems on which all life depends.

We combine the power of more than two million members and online activists with the expertise of some 500 scientists, lawyers, and policy advocates across the globe to ensure the rights of all people to the air, the water, and the wild."

SDSUs DEIR relies on out-of-date research to assert that Sophomores should be coerced to live on campus.

SDSUs DEIR makes a significant objective of the project to exploit "undeveloped" land.

SDSUs DEIR acknowledges that its flawed project has significant, non-mitigatable impacts

SDSUs DEIR asserts that noise and light pollution will not have significant impacts on animals, humans or plants, though it provides not objective research as support.

In short, SDSUs DEIR does not comply with CEQA, it does not comply with a major university's obligation to the community and the environment, and it does not comply with my understanding of the goals and mission of the NRDC.

Sincerely,

Mark Nelson

I119-1

I119-2

I119-3

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Response to Comment Letter I119

Mark Nelson

June 3, 2017

- I119-1** The comment is an introduction to comments that follow and asserts that the proposed project is “antithetical to the mission of the Nature Conservancy.” The comment expresses the opinions of the commentator and does not raise an issue specific to the EIR or its analysis. No further response can be provided or is required.
- I119-2** The comment makes several claims regarding the Draft EIR as related to Aztec Canyon. To the extent the comment is addressing the impacts that would have resulted with implementation of project Phases II and III, the proposed project was modified following public comment and no longer includes Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modification. Please also see the Biological Resources Thematic Response, which explains that all remaining significant impacts would be mitigated to less than significant. Beyond that, 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.
- I119-3** The comment asserts that the EIR does not comply with CEQA. 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.

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Responses to Comments - Individuals

Comment Letter I120

Mark Nelson
5417 Hewlett Drive
San Diego, CA 92115
menelson@gmail.com

June 3, 2017

Laura Shinn
San Diego State University
LShinn@mail.sdsu.edu

SUBJECT: Environmental Defense Fund Member Opposition to the SDSU DEIR (4/21/17)

I am a member of EDF. As a member, I assert that SDSUs planned West Campus housing project and associated DEIR (4/21/17) are antithetical to the mission of EDF. In brief, the mission of the EDF is:

"Our mission is to preserve the natural systems on which all life depends.
Guided by science and economics, we find practical and lasting solutions to the most serious environmental problems."

SDSUs DEIR does not meet the mission of EDF

SDSUs DEIR targets destruction of Aztec Canyon through biased project objectives, such as exploiting undeveloped land
SDSUs DEIR targets destruction of Aztec Canyon through biased project objectives, such as refusing to consider
redevelopment projects as environmentally preferred sites

SDSUs DEIR targets destruction of Aztec Canyon through biased project objectives, such as refusing to consider its land
acquisition ability and condemnation rights to create environmentally preferred sites

SDSUs DEIR fails to recognize the State of California's explicit commitment to Aztec Canyon, as carefully explained in the
San Diego County Sierra Club's comments.

In short, SDSUs DEIR does not comply with CEQA, it does not comply with a major university's obligation to the
community and the environment, and it does not comply with my understanding of the goals and mission of EDF.

Sincerely,

Mark Nelson

I120-1

I120-2

I120-3

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Response to Comment Letter I120

Mark Nelson

June 3, 2017

- I120-1** The comment is an introduction to comments that follow and asserts that the proposed project is “antithetical to the mission of EDF.” The comment expresses the opinions of the commentator and does not raise an issue specific to the EIR or its analysis. No further response can be provided or is required.
- I120-2** The comment makes several claims regarding the Draft EIR as related to Aztec Canyon. To the extent the comment is addressing the impacts that would have resulted with implementation of project Phases II and III, the proposed project was modified following public comment and no longer includes Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modification. Please also see the Biological Resources Thematic Response, which explains that all remaining significant impacts would be mitigated to less than significant, and the Alternatives Thematic Response, which addresses the proposed project’s goals and objectives as complying with CEQA. Beyond that, 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.
- I120-3** The comment asserts that the EIR does not comply with CEQA. 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.

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Responses to Comments - Individuals

Comment Letter I121

Mark Nelson
5417 Hewlett Drive
San Diego, CA 92115
menelson@gmail.com

June 3, 2017

Laura Shinn
San Diego State University
LShinn@mail.sdsu.edu

SUBJECT: Sierra Club Member Support of San Diego County Sierra Club Comment Letter dated 6/2/17

I am a member of the Sierra Club. As a member, I am in complete agreement with the views of my local San Diego County Sierra Club. I have attached and I submit the comments of my Sierra Club as my own as a co-sponsor as a member of Sierra Club.

Briefly, as noted by Sierra Club, the DEIR is deficient in the following general areas:

1. SDSU and its contractors failed to conduct adequate biological surveys, given the known biologically sensitive area as recognized by the City of San Diego, California Department of Fish and Wildlife and US Fish and Wildlife Service. The fact that SDSUs biological survey failed to discover sensitive plants and wildlife is prima facie evidence of its inadequacy.
2. SDSU failed to consider other appropriate sites, largely because SDSU put unreasonable, environmentally damaging restrictions on site selection such as SDSU ownership, refusal to consider site redevelopment, and requirement of undeveloped land.
3. SDSU failed to consider higher density use of Lot U/9 east of Chapultepec Hall as found in SDSUs 2013 West Campus plan.
4. SDSU denied the findings and agreements of the State of California via California Department of Fish and Wildlife, disavowing any role in the MSCP, despite the fact that the State of California was a CEQA party to the MSCP.
5. I bring forward the conclusion of my Sierra Club and require it be addressed by SDSU in the DEIR:

"In sum, we can conclude, based on omissions from the DEIR as well as significant admissions in the DEIR, that the project is out of compliance with CEQA and unnecessarily encroaches on an undeveloped canyon. We urge San Diego State University to abandon phases two and three of this project, consider alternative sites for these dormitories, and to produce a document in compliance with CEQA and the commitment of SDSU to be a green campus."

Sincerely,

Mark Nelson

Attachment: San Diego County Sierra Club Comments to DEIR

I121-1

I121-2

I121-3

I121-4

I121-5

I121-6

I121-7

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Response to Comment Letter I121

Mark Nelson

June 3, 2017

- I121-1** The comment is an introduction to comments that follow. No further response is required.
- I121-2** The comment is an introduction to comments that follow. No further response is required.
- I121-3** The comment asserts that the EIR does not include adequate biological surveys. The assertion is incorrect. Please see the Biological Resources Thematic Response, and also refer to response to comment O3-14 for information responsive to this comment.
- I121-4** The comment asserts that the EIR failed to consider appropriate alternative sites. The comment is incorrect. Please see the Alternatives Thematic Response for information responsive to the comment. Relatedly, 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.
- I121-5** The comment asserts the EIR failed to consider higher density use of Lot U/9. In response, please see the Alternatives Thematic Response for information responsive to the comment.
- I121-6** The comment regards the Multi-Species Conservation Plan and California State University. Please see the Biological Resources Thematic Response and also refer to responses to comment O6-114 and O6-115 for information responsive to the comment.
- I121-7** The comment claims the EIR does not comply with CEQA and, in doing so, 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 Proposed Project.

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Comment Letter I122

On Tue, May 9, 2017 at 9:13 PM, Sam <sgh3@me.com> wrote:
Dear Ms. Shinn,

As a neighbor, a community member and an SDSU Graduate student, I am writing to strongly oppose SDSU's plans to build in Aztec Canyon. The canyon is a beautiful, open space that was set aside for preservation and is home to numerous species of wild plants and animals. SDSU has numerous other sites it can build on to meet its objectives. Aztec Canyon should not be considered. I urge SDSU to select one of its alternative sites for its project.

I122-1

Sincerely,

Samuel Hoover

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.

I122-2

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Response to Comment Letter I122

Samuel Hoover

May 9, 2017

- I122-1** 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 EIR. For that reason, no further response to this comment is provided.
- I122-2** 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 EIR. For that reason, no further response to this comment is provided.

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Responses to Comments - Individuals

Comment Letter I123

Henry A. Bertram
5351 Saxon St.
San Diego, CA 92115
hanksandiego@gmail.com

June 4, 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

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

I've lived in the College View Estates ("CVE") neighborhood of San Diego for 33 years. The neighborhood is situated just over the western property line of the San Diego State University campus. I've attended public meetings in which SDSU representatives have presented and attempted to explain and justify the new dormitory building project proposed for the undisturbed canyon west of the existing Chapultepec dorm and adjacent to our single-family residential neighborhood. I strongly oppose phases 2 and 3 of 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 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 2,600 bed, \$500 Million project it should have built in time for environmentally responsible site selection.

I123-1

I123-2

I123-3

Responses to Comments - Individuals

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.
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.

I123-4

I123-5

I123-6

I123-7

Responses to Comments - Individuals

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 very recent local surveys for the active City of San Diego utilities undergrounding project which is currently underway in CVE (reference www.sandiego.gov/undergrounding, 619-533-3841) positively 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.
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." SDSU's construction must use the highest mix possible of renewable natural gas, bio methane, 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. 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

I123-8

I123-9

I123-10

I123-11

I123-12

Responses to Comments - Individuals

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. 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.

↑ I123-12
Cont.

I123-13

Sincerely,

Henry A. Bertram

Henry A. Bertram
SDSU class of '76
CVE Homeowner since 1984
Area resident since 1974

CC: TWhite@Calstate.edu, TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu,
PresOffi@mail.sdsu.edu, mcollins@mail.sdsu.edu

NOTE: TrusteeSecretariat@CalState.edu instructions are to **DISTRIBUTE TO ALL CSU TRUSTEES AND ALTERNATES**

***Response to Comment Letter I123**

Henry A. Bertram

June 4, 2017

- I123-1** The comment is an introduction to comments that follow. No further response is required.
- I123-2** 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.
- I123-3** See response I123-2.
- I123-4** 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.
- I123-5** 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.
- I123-6** See response I123-5.
- I123-7** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.

Responses to Comments - Individuals

- I123-8** Please see the Biological Resources Thematic Response for information responsive to this comment.
- I123-9** Please see the Biological Resources Thematic Response for information responsive to this comment.
- I123-10** 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 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.
- I123-11** 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 Chapters 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.

I123-12 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 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 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. 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

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 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.

- I123-13** The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. As previously noted, the proposed project has been modified to eliminate Phases II and III. As a result, because the proposed project no longer includes Phase III, there will be no significant and unavoidable traffic impacts. 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.

Mark Nelson
5417 Hewlett Dr
San Diego, CA 92115
menelson@gmail.com

June 5, 2017

Laura Shinn
Director
SDSU Planning
By email to LShinn@mail.sdsu.edu

The following comments on the Draft EIR, posted April 21, 2017 are comments that were made by me as public input on the NOP and were either not considered anywhere in the DEIR, or not considered fully during DEIR preparation. As a result, I file these comments again as deficiencies in the DEIR for resolution prior to issuance of a Final EIR to be considered in their entirety. Where possible, I have identified the section or sections of the DEIR that should contain the analysis for each comment. **Recall again, this is the 2nd time that SDSU has received these comments, so this is a 2nd request for clearing EIR deficiencies for each point.**

I124-1

These comments can also be found in the attached original comment letters submitted in December 2016 and January 2017 to Laura Shinn via email.

Section 4.8 Hazards and Hazardous Materials

Section 4.13 Public Services and Utilities

Section 8 Significant Irreversible Environmental Changes

Development of a publicly available monitoring, reporting, and suppression plan for "Valley Fever"

Coccidioidomycosis (also known as "Valley Fever"), is a disease caused by *Coccidioides immitis* and *C. posadasii*, two nearly identical species of pathogenic fungi found only in the Western Hemisphere. *Coccidioides* spp. grow in the top 2–8 inches of soil. According to many peer-reviewed studies, coccidioidomycosis can be a severe disease with links to community-acquired pneumonia and a number of other illnesses and symptoms. Valley Fever is a risk for students, adjacent property residents, and workers. Especially at-risk groups include immune-compromised, AIDS/HIV positive, elderly, and other minority and disadvantaged local populations. Frequent testing and public reporting will be required due to the movement of soils for construction and the recent cases in eastern San Diego County and should be added to the Study.

According to the California Department of Public Health, the following groups are disproportionately impacted and at risk to Valley Fever:

I124-2

- Older adults (≥60 years old)
- African Americans, Filipinos, and Hispanics
- Pregnant women especially in the later stages of pregnancy
- Persons with diabetes
- Persons with conditions that weaken their immune system such as:
 - Cancer
 - Human immunodeficiency virus (HIV) infection

Responses to Comments - Individuals

o Treatment with chemotherapy or steroids
o Organ transplant

References: The Public Health Impact of Coccidioidomycosis in Arizona and California,
Int J Environ Res Public Health. 2011 Apr; 8(4): 1150–1173.;
<http://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf>

I124-2
Cont.

Section 4.8 Hazards and Hazardous Materials

Section 4.13 Public Services and Utilities

Section 8 Significant Irreversible Environmental Changes

Development of a permanent, ongoing fire reduction, public monitoring, and suppression plan for the canyon

Based on the County of San Diego's fire hazard maps, the canyon west of SDSU and specifically in phase three construction is rated a VERY HIGH fire hazard severity zone (designation from CAL FIRE's Fire and Resource Assessment Program). As a result, during construction, and post-construction when one to two thousand students are housed cantilevered over the canyon, the risk of a fire hazard in both increased in frequency (due to the increased human activity adjacent to, inside of, and over the canyon) and potential damage (due to the housing jetting out into the canyon). As a result, a permanent, ongoing fire hazard reduction, monitoring, and suppression plan is required for any work, and subsequent housing in the canyon to reduce and manage risk for the project and adjacent landholders and should be added to the Study.

References: <http://www.readysandiego.org/wildfire-hazard-map/>

I124-3

Section 4.8 Hazards and Hazardous Materials

Section 8 Significant Irreversible Environmental Changes

Seasonal Affective Disorder

Subject to a thorough shading analysis of shading caused by the project, 6-12 story units will severely shade homes to the west, leading to increased propensity of reduced sunlight and potential impacts of Seasonal Affective Disorder (SAD). A fund is required to compensate impacted households for their required medical care and any home lighting retrofits that are required.

I124-4

Section 4.1 Aesthetics

Direct View into Homes

Subject to visual sight-line analysis, 6-12 story units will provide severely degrade the existing reasonable expectations of privacy in adjoining homes. As a result, mitigation will need to be taken to remove windows from the 6-12 story units that face the homes to the west. A fund is required to compensate impacted households for their lost property value and any home privacy retrofits that are required. It may further be required that the number and location of dormitories be limited to avoid any direct view into homes.

I124-5

Sun Glare into Adjacent and Neighboring Homes

Subject to a glare and reflection analysis of the project, 6-12 story units will create reflection and related heat from both white concrete and any glass/metallic surfaces that will be directed to adjoining homes and landowners. As a result, mitigation will need to be taken to remove windows from the 6-12 story units that face the homes to the west and modify west facing materials. A fund is required to compensate impacted households for their lost property value and any home retrofits that are required. It may further be required that the number and location of dormitories be limited to avoid any reflection into homes.

I124-6

Night Time Light Pollution into Adjoining and Neighboring Homes

Subject to an artificial lighting analysis of the project, 6-12 story units will likely have outdoor and room-created lighting sources that will be directed to adjoining homes and landowners. As a result, mitigation will need to be taken to remove windows from the 6-12 story units that face the homes to the west that will emit light, and to shield security and outdoor lighting to not impact adjoining and neighboring homes. A fund is required to compensate impacted households for their lost property value and any home retrofits that are required.

I124-7

Section 4.6 Geotechnical Resources

Natural and Induced Seismic Mitigation

The canyon to the direct west of SDSU (the location of phase three) appears to be caused by the La Nacion fault system (M 6.7 capable) as reported by the state of California and cited in the City of San Diego General Plan. The fault traces to a known northern terminus at Yerba Santa Drive and Norris Road per seismicity maps, which is a location approximately 2000 feet WSW of the western most cantilever of the proposed project. The natural seismicity of the area will be a design criterion for the project, however induced seismicity and related construction induced damage to adjoining properties such as foundation cracks and settling that would not have otherwise occurred must be considered and a fund created to compensate adjoining landholders.

I124-8

Additionally, the significant risk of seismic collapse due to the active fault system into the adjacent landowners must be fully mitigated, including engineering design to assure that all four 6-12 story dormitories of phase three will collapse to the north down the canyon, leaving no chance of death and major destruction to the landowners to the west in unreinforced 1950s dwellings. The proposed proximity to SDSU's western lot line, without significant setbacks, provides the opportunity for 70-150 foot tall buildings to collapse onto adjoining structures.

Fault Reference:

Fault Name	La Nacion fault
Zone Name	La Nacion fault zone
Age	QT
Fault Type	fault, certain
Jennings ID	493
Fault Source	Kennedy and Tan (1977)

I124-9

The La Nacion fault system, which essentially parallels the Rose Canyon fault zone, consists of two major faults: the La Nacion and the Sweetwater. The La Nacion, discovered in 1971, extends south from the Collwood Boulevard-Montezuma Road area along 54th Street, crosses State Highway 94 in the vicinity of Federal Boulevard, and then angles to the southeast through Paradise Hills. It reenters the City of San Diego at Otay Valley just easterly of Interstate 805 (I-805), and roughly parallels the latter into the San Ysidro area. It then takes a southeast turn into Mexico.

There are two potentially active fault systems within the San Diego region having sufficiently verified length to produce large magnitude earthquakes. These fault systems, the Rose Canyon and La Nacion, could produce credible events of approximately M 7.1 and 6.7, respectively.

I124-10

References: <http://maps.conservation.ca.gov/cgs/fam/>;
<https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/generalplan/seismicsafetyelement.pdf>;
<ftp://ftp.consrv.ca.gov/pub/dmg/pubs/fer/82/010579.pdf>
http://aese2006.geology-guy.com/images/marshall_fig2.jpg

Section 4.14 Traffic

Parking and Traffic Patterns

Subject to a full examination of traffic patterns, traffic volumes, and new parking structures, it would seem that the addition of approximately 2,000 occupants in a 2 block area adjacent to College View Estates will lead to substantial increases in traffic in the area, leading to: 1) increased GHG and criterial pollutants from both trips and idling, 2) decreased ability for emergency vehicle traffic access, 3) decreased local property values, and 4) increased illegal and night time parking. SDSU intends to decrease parking and increase students in the project, which is a very peculiar action when increasing population.

Following the analysis and mitigation plans for both GHG and criterial pollutants, consideration of a gating system for resident traffic only for both entrances to College View Estates should be considered, along with full costs of development, maintenance and 24/7/365 monitoring financed by the project. Furthermore, the decreased local property values should burden the project with either compensation fund or direct purchase of adjoining homes by SDSU.

Section 2 Project Description

(Note: It has come to my attention via questions to SDSU that it has the right of condemnation and can condemn the apartment buildings directly north of Chapultepec Hall, but rejected that option out of hand. As a result, the DEIR and resulting CEQA analysis are INVALID. SDSU has tools of environmental mitigation available, but instead SELECTED Significant Irreversible Impacts by failing to consider condemnation. My original comments are below.)

As a result, the following proposal should be analyzed for the CEQA documents:
Construction is maximized using land to the East and North of Chappy Hall, avoiding construction to the West entirely. Construction uses the parking lot the east of the existing Chappy Hall and north of the hall down the streets that now have dilapidated student apartments that are held by the university. This reduces costs and local impacts.

Section 4.14 Transportation-Circulation and Parking PDF

Section 8 Sig Irreversible Envr Changes PDF

Student parking impacts, legal or illegal, in the current Permit B area must be studied to determine the potential impacts of 2,000+ students with no vehicle parking on campus (in fact, SDSU plans to reduce parking while adding student beds) on both daytime and 7PM to 7AM parking in the adjacent area. Since even a 10% fraction of students having cars would increase the need for night time SDSU parking by over 200 cars, and since there is no guest parking proposed for visitors to the dorms, especially overnight visitors, the impact to the parking of the surrounding neighborhood is potentially significant. The only feasible mitigation would be prohibiting sophomores from having cars, or, building substantial parking.

Section 2 Project Description

I124-11

I124-12

I124-13

I124-14

I124-15

The No Project Alternative for Sophomore Success – in order to assure that the CEQA protects the environment, we need to see the No Project Alternative along with peer reviewed research that unequivocally states that sophomores must live in environmentally damaging on-campus dorms to succeed at SDSU.

1124-16

Section 4.8 Hazards and Hazardous Materials

Section 8 Significant Irreversible Environmental Changes

There have been historic mold problems on the existing Chapultepec site, and as a result, all molds and mold toxins will need to be screened from all potential impacted, greenfield and canyon sites for naturally occurring, and remnant molds from the prior Chapultepec mold problem. This analysis of mold needs to extend to potential infections of neighboring landholders, who were impacted with health problems during the first Chapultepec mold problem. The attachment documents the mold in the area and the molding of the hall at the time of new construction due to poor water clearance by the native soils and the CSU supervised construction.

1124-17

Section 4.13 Public Services and Utilities

Raw sewage backup has been a historic problem in the Hewlett neighborhood since Chapultepec Hall was built. SDSU must examine the impacts of its sewage on the local system and fully mitigate.

1124-18

Section 2 Project Description

Section 4.10 Land Use and Planning PDF

Section 8 Sig Irreversible Envr Changes PDF

Following discussions at the January 18, 2017 Scoping Meeting, the Sophomore Success representatives from SDSU stated that the driver of the project was to increase sophomore success by requiring on campus residency. As a result, the CEQA must analyze the economic impacts on students and their success as part of the economic assessment of that alternative, whether preferred or alternate. Based on the SDSU website, current room/board on campus in the dorms ranges from \$1536-\$2037 per month, depending on room type and meal plan. Comparing that to off campus living estimates of \$1126 per month from UCSD for off campus living (La Jolla is a much more expensive area than eastern San Diego), sophomore student costs will nearly double if forced to live on SDSU campus. Clearly affordability of education is a key driver in many peer-reviewed studies of student success. As a result, the CEQA analysis must clearly identify the negative impacts on sophomore students from an estimated 36%-81% increase in their monthly living costs from being forced to live on campus. It is entirely possible these costs may swamp any potential benefits of the requirement and render any such alternative moot. Peer-reviewed research should be cited and provided on findings to the contrary. UCSD's estimated student room/board for off-campus can be found at <http://faofirms.ucsd.edu/forms/6budgetUG.pdf> SDSU does not appear to have a public estimate of off-campus undergraduate living.

1124-19

1124-20

Section 4.8 Hazards and Hazardous Materials

Section 4.13 Public Services and Utilities

Section 8 Significant Irreversible Environmental Changes

Impacts from Crime Levels and Frequency

The project could have a significant impact under CEQA if it exposes the public to increased potential for crime, exposes the public to increased danger from accidents, or impairs emergency response capability within surrounding communities. The approximate 500% incremental in students being placed in the

1124-21

close proximity of a residential neighborhood may create a significant impact due to SDSUs relatively greater crime rate than the surrounding area. A relatively higher number of crimes per person are perpetrated on the SDSU campus, including recent hate crimes publicized by the SDSU President. As a result, this significant increase in students will place local residents adjacent to the new project in harm's way at a significantly higher rate due to the student population increase. This may impact safety directly, both property and violent crime, and also reduce the response time of emergency and police personnel due to increased trips.

I124-21
Cont.

Impacts on Sexual Assault Rates and Increased Total Cases of Rape from Increased Mandatory Dorm Living

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 should 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. The spillover effects of this much higher crime rate is a material risk to the surrounding community that also must be considered.

I124-22

I124-23

<http://www.thedailyaztec.com/73087/news/data-shows-most-on-campus-sexual-assaults-occur-in-dorms/>

<https://oag.ca.gov/crime/cjsc/stats/crimes-clearances>

https://en.wikipedia.org/wiki/San_Diego_State_University

Impacts from Increased Regional Evacuation Hazards

The approximate 500% increase in student in the local area may create a significant evacuation hazard for the local area in the event of an earthquake from the local fault system La Nacion that is 2000' to the southwest, an event on the Rose Canyon fault system, or a fire in the designated hazardous fire area canyon. Mass evacuation of local residents would be completely swamped by the total 3,000-5,000 students in the complex, especially in a night emergency with only 2 exit roads available. This may significantly impact local safety and reduce the ability of emergency personnel to respond.

I124-24

Impacts from Cigarette, Cigar, Pipe, Vape, Marijuana, and other Second Hand Smoke

SDSU bans smoking on campus, and as such, students currently enter that surrounding neighborhoods to smoke the various aforementioned substances. As a result of SDSUs actions and failure to provide smoking areas, surrounding neighbors are directly exposed to second hand smoke by SDSU. The addition of 3,000 more students will add hundreds of smokers seeking locations to exhale their carcinogens from second hand smoke. San Diego County has the highest rate of youth smoking in California at 13.1%, so there is credible reason to believe this may become a significant impact and health hazard. In addition, the risks of discarded, burning material by increased smokers into a canyon that is already designated an Official Very High Fire Hazard Severity Zone is a potentially significant impact as a dual result of SDSU banning smoking, SDSU failing to provide a location for smoking and the significant increase in students from the project.

I124-25

Responses to Comments - Individuals

<https://www.cdph.ca.gov/programs/tobacco/Documents/CDPH%20TCP%20Refresh/Research%20and%20Evaluation/Facts%20and%20Figures/FactsFigures2016PrePrintEditionV2.pdf>
<https://www.sandiego.gov/sites/default/files/legacy/fire/pdf/maps/grid20.pdf>

Impacts from Falling Objects from Operable Windows of Proposed 6-12 Story Dorms

The current Chapultepec hall has operable windows that pose safety hazards from falls, falling objects, cigarettes/burning debris, and other projectiles. This can cause significant safety and environmental impacts, especially from the proposed project with its units built in the environmentally sensitive/extreme high fire risk canyon. A study of the current window projectile activity using both ground collection and video surveillance should be undertaken. Operable windows should not be allowed in any future canyon construction and pose a potential significant impact to safety and the environment.

1124-26

Impacts from Significant Increases in Localized, Concentrated Population

The addition of a significant number of incremental residents in the area is likely to tax local fire, police, ambulance and other mobile based emergency response. As a result, the local neighborhood may face significant impacts of risks of death, injury, or lack of response from the existing emergency resources due to their dilution by use of additional local residents adjacent to the College View Estates area, specifically including Hewlett Drive.

1124-27

Impacts from Microwave, Wide Area Network, Wi-fi Radiation, EMFs and Motor-induced Vibration/Waves

The addition of significant facilities directly adjacent to a residential area, including but not limited to radiation from microwave generation, microwave communication, various data networks such as 802.11, and other sources of radio and radiation waves may have significant impacts on adjoining human, animal and plant life, including endangered species. Further, vibration, EMFs and other emissions from equipment, including but not limited to motors, air handlers, cell towers, and electronics may cause significant impacts to adjoining human, animal and plant life, and endangered species.

1124-28

Impacts from Obesity, Weight Gain, and Unhealthy Eating Caused by Mandatory On-Campus Resident Requirements

According to SDSU media reports, freshman are being warned of freshman weight gain, caused by fast food, sugary coffee drinks and the dorm food plans. Specifically, freshman are warned by SDSU that use of their mandatory food plan at prevailing choices such as Rubios, Panda Express and Taco Bell (for example) is unhealthy. Since freshman at SDSU have a mandatory on-campus requirement, there is a reasonable expectation that requiring sophomores to live on campus and purchase equivalent unhealthy meal plans will lead to continued weight gain, dictated food choices, and obesity. These significant impacts on mandated dorm residents and their short term and long term health should be studied in the EIR as they can lead to lifelong diseases such as diabetes. In a recent study, San Diego County had 5.8% of its population with diabetes, with a young adult rate of approximately 2.3%. Poor choices from mandated on-campus food plans and dorm living will not reduce this menace to students.

1124-29

<http://www.thedailyaztec.com/31588/arts-and-lifestyle/arc-trainer-helps-combat-the-freshman-15/>
http://diabetescoalitionofcalifornia.org/wp-content/uploads/2013/11/Diabetes_in_California_Counties_2009_final.pdf

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Sincerely,

Mark Nelson
Member – CVEA, NRDC, Sierra Club, EDF, Nature Conservancy

Attachments:

Original Response Letters to the NOP Comment Period

Response to Comment Letter I124

Mark Nelson

June 5, 2017

I124-1 The comment is an introduction to comments that follow. No further response is required.

I124-2 The comment raises concerns regarding Valley Fever. Preliminarily, as the comment relates to development adjacent to the canyon, in response to public comments, the proposed project has been modified and no longer includes Phases II and III, which are the two phases that would be developed nearest to the canyon. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, to the extent the comment is directed towards Phases II and III, the comment is no longer applicable. Nonetheless, as the proposed project would include development in the general proximity of the canyon, the following information is provided relative to Valley Fever.

Coccidioidomycosis, more commonly known as “Valley Fever,” is an infection caused by inhalation of the spores of the *Coccidioides immitis* fungus that commonly grows in the soils of the southwestern United States. When fungal spores are present, any activity that disturbs the soil, such as digging, grading or other earth moving operations, can cause the spores to become airborne and thereby increase the risk of exposure. The ecologic factors that appear to be most conducive to survival and replication of the spores are high summer temperatures, mild winters, sparse rainfall, and alkaline sandy soils.

The County of San Diego Health and Human Services Agency (HHSA) compiles Valley Fever rates per zip code. Based on HHSA information, the proposed Project site is within an area with the lowest background risk of Valley Fever in the County (County of San Diego 2008). In addition, according to the California Department of Public Health (CDPH), an average of 115 confirmed cases of Valley Fever were reported in San Diego County each year between 2011 and 2015 (CDPH 2016). The CDPH data shows the number of confirmed Valley Fever cases is declining. Accordingly, there is no evidence to suggest Valley Fever is a significant concern within the vicinity of the Project site.

While the risk of releasing Valley Fever spores during the Project’s construction phase is reasonably anticipated to be low, based on the location of the Project site, it also should be noted that SDSU would comply with SDAPCD Rule 55 (which establishes fugitive dust abatement measures, including watering disturbed areas on the Project site three or more times per day during the construction phase, to minimize adverse air quality impacts). This watering requirement is consistent with

CDPH recommendations for the implementation of dust control measures, including regular application of water during soil disturbance activities, to reduce exposure to Valley Fever – the watering minimizes the potential that the fungal spores become airborne (California Department of Public Health 2013). Further, regulations designed to minimize exposure to Valley Fever hazards are included in Title 8 of the California Code of Regulations and would be complied with during the Project's construction phase (see <http://www.dir.ca.gov/dosh/valley-fever-home.html>).

In closing, the Project would not result in a significant impact attributable to Valley Fever exposure based on its geographic location and compliance with applicable regulatory standards that serve to minimize the release of and exposure to fungal spores.

- I124-3** 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 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. The Project would be required to prepare and implement a construction fire prevention plan to minimize the likelihood of construction related activities resulting in fire. Ongoing fire safety would be monitored by facilities personnel and inspected annually by SDFD.
- I124-4** 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.
- I124-5** The comment claims the Draft EIR failed to address the "reasonable expectations of privacy in adjoining homes." However, reasonable expectations of privacy in adjoining homes is not specifically protected by CEQA and specific thresholds of significance related to expectations of privacy have not been established in Appendix

- G of the CEQA Guidelines or the City of San Diego's CEQA Significance Determination Thresholds. As such, expectations of privacy are not specifically considered or addressed in Section 4.1, Aesthetics, of the EIR. With respect to aesthetics-related significant and unavoidable impacts, as previously noted, the proposed project has been modified and no longer includes either Phase II or Phase III. As a result, the proposed project would no longer result in significant and unavoidable impacts.
- I124-6** The commentator expresses their opinion regarding the glare impacts of the Project. Project impacts concerning substantial new sources of glare and daytime views are addressed in EIR Section 4.1, Aesthetics, and in the Lighting Technical Report prepared for the Project. Based on the results of the lighting analysis, Project lighting would create low contrast ratios that would be below established significance thresholds as experienced at identified receptor locations. Further, and as detailed in Section 4.1, the Project would be required to demonstrate compliance with SDSU's Physical Master Plan to ensure structures would not contain large expanses of reflective glass or reflective metal surfaces that would cause undue glare to passing mobile viewers and/or present a visual hazard to adjacent land uses during construction or permanently. Based on the analysis presented in Section 4.1, the EIR determined that Project impacts related to glare would be less than significant and would not require mitigation.
- I124-7** 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 provides that the light from 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 EIR determined that Project impacts related to lighting would be less than significant and would not require mitigation.
- I124-8** The comment raises concern regarding potential impacts resulting from construction activities. Preliminarily, there will be no pile-driving as part of project construction activities, and, as to excavation depth, soil removal would go to a depth of 12 feet from existing grade in isolated pocket locations. Moreover, while pile driving and deep excavations can adversely impact immediately adjoining properties, the distance from the Project site to nearby residences in this

case would preclude any such impacts. As previously noted, the proposed project has been modified and no longer includes Phases II or III. As a result, the distance from the nearest off-site single-family residence (55th Street to the northeast) to the site of the proposed project construction (Lot U) is approximately 100 feet. Such a distance would result in adverse impacts to existing off-site residential structures from construction noise. However, mitigation would be implemented to decrease construction noise impacts to nearby off-site single-family residences (see MM-NOI-1 in Section 4.11, Noise). In addition, vibration associated with construction activity has been addressed in Section 4.11, Noise.

- I124-9** The comment regards potential earthquake-related impacts. With respect to potential collapse of the Phase III towers onto nearby residences, as previously noted, the proposed project has been modified and no longer includes Phases II or III.

With regard to the La Nacion Fault, please see page 4.6-4 of the EIR for the most up to date information on this fault. The EIR has adequately addressed and analyzed potential impacts related to the La Nacion Fault and no further analysis is necessary. 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.

- I124-10** With regard to the La Nacion Fault, please see page 4.6-4 of the EIR for the most up to date information on this fault, most of which is consistent with the links provided in the comment. However, with respect to the maximum magnitude of the La Nacion Fault, it appears that an old version of the City of San Diego General Plan, Seismic Safety Element (SSE) is available online, as evidenced by the link provided in the comment. The updated City SSE was completed in June 2015, as an updated section to the 2008 General Plan (<https://www.sandiego.gov/planning/genplan#genplan>). Note that on page 243 of the older (undated) version of the SSE, the sources of seismic information were based on reports from 1974 and 1977. The maximum credible earthquake on the La Nacion Fault of magnitude 6.7, as described in the older SSE, is a Richter magnitude, which is typically not used by today's seismologists, geologists, and geotechnical engineers. Rather, earthquakes are described in terms of moment magnitudes, denoted with an "M" or " M_w ". Please see https://www.iris.edu/hq/inclass/animation/magnitudes_moment_magnitude_explained. As explained in this link, Richter scale is mostly effective for regional earthquakes no greater than M5. Moment magnitude is more effective for large earthquakes and uses more variables to calculate the energy released during an earthquake.

The source of the analysis in the EIR (on page 4.6-4) indicating a maximum credible earthquake of 6.2 to 6.6 is based on San Diego County Offices of Emergency Services (OES 2017), which should have been described as "M6.2 to

M6.6 (moment magnitude)”. Therefore, the Final EIR will include revised text including a brief explanation regarding moment magnitude vs. Richter, as this can be a source of confusion.

With respect to the Rose Canyon Fault Zone, please see page 4.6-3 of the EIR for the most up to date information on this fault, most of which is consistent with the links provided in the comment. However, page 4.6-3 of the EIR indicates that the largest credible earthquake predicted for this fault is a “magnitude 7.2”. Similar to the La Nacion Fault, the text will be edited to “M7.2 (moment magnitude)”.

I124-11 The comment states that the proposed Project will lead to substantial increases in traffic in the area, leading to increased GHG and criteria pollutants. EIR Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, provide an extensive analysis of the Project’s impacts relative to GHG and pollutant 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 before a final decision on the Project.

Similarly, the comment refers to decreased ability for emergency vehicle access (addressed in EIR subsection 4.14.6.11), and increased illegal and night time parking (addressed in EIR subsection 4.14.6.4, College View Estates Spillover Parking). However, the comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. As to the comment regarding decreased local property values, the California Environmental Quality Act requires such analysis only in those instances in which the decrease in value (i.e., economic impact) would lead to physical effects, such as blight. There is no evidence in this case that the proposed project would result in neighborhood blight. The comment, like all comments, will be included as part of the record and made available to the decision makers before a final decision on the Project.

I124-12 The comment states that consideration of a gating system for resident traffic only for both entrances to College View Estates should be considered. Preliminarily, the geographic distribution of vehicle trips generated by the proposed New Student Housing project, which was determined using the SANDAG travel demand model, showed that approximately 98% of Project generated traffic would drive east on Remington Road or Canyon Crest Drive, while only approximately 2% would drive west on Remington, into the College View Estates neighborhood. As noted in the response to comment I-124-11, increased illegal and night time parking was addressed in EIR 4.14.6.4, College View Estates Spillover Parking. The analysis notes that as part of the Project, a permanent sign on Remington Road at the SDSU

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campus boundary with the College View Estates neighborhood will be installed to curtail campus spillover parking in the neighborhood. In addition, parking posts will continue at that location to discourage parking in the residential neighborhood during events at Viejas Arena and during baseball games. As to the comment regarding property values, please see the response to comment I-124-11.

I124-13 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.

I124-14 The comment suggests that construction to the west of Chapultepec Hall be avoided entirely. In response to comments received on the Draft EIR, and President Hirshman's corresponding directive, SDSU has eliminated development of Phases II and III from the proposed project. Please see Final EIR, Preface, for additional information regarding the project modifications..

I124-15 The comment states that student parking impacts in the current Permit B area must be studied to determine the potential impacts. EIR subsection 4.14.6.4, Parking Assessment, includes an analysis of the Project's impacts relative to parking, generally, and College View Estates Spillover Parking, specifically, and addresses the fact that the College View Estates neighborhood lies within the City of San Diego's Area B. To reduce student parking in the residential neighborhood, Area B limits parking in the portion of College View Estates nearest SDSU. 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 before a final decision on the Project.

I124-16 The comment is critical of the Proposed 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 in this regard.

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 and 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.

- I124-17** The comment refers to “mold problems” on the existing Chapultepec site and related development on the adjacent greenfield and canyon sites. As previously noted, the proposed project has been modified to eliminate Phases II and III and, therefore, no longer includes development on greenfield or canyon sites; Phase I would be developed on existing parking lot U. Moreover, the proposed project would be constructed consistent with applicable standards of practice and all appropriate safeguards to prevent mold. As such, the comment is no longer applicable. 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.
- I124-18** The comment regards historic sewer capacity issues in the Hewlett neighborhood to the west of the project site. The projected wastewater generation of the proposed project was calculated and analyzed in EIR Section 4.13 Public Services and Utilities, subsection 4.13.6. The analysis concluded that the proposed project wastewater generation would not exceed the capacity of the existing sewer main located in Remington Road.
- I124-19** 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 information responsive to this comment.

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

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between Fall 2008 and 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.

- I124-20** The comment regards the proposed project's goals and objectives and the Sophomore Success Program. Please see the response to comment I124-19 for information responsive to this comment.
- I124-21** The comment regards potential impacts related to crime, danger from accidents, and emergency response. To the extent required by CEQA, these topics are addressed in the EIR. See, e.g., EIR Section 4.13, Public Services and Utilities. Beyond this, 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.
- I124-22** The comment regards potential impacts related to sexual assault. To the extent required by CEQA, law enforcement related issues are addressed in EIR Section 4.13, Public Services and Utilities. Beyond this, 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.
- I124-23** The comment is a continuation of comment I124-22. Please see the response to comment I124-22 for information responsive to this comment.
- I124-24** The comment regards potential impacts related to emergency evacuation. 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

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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. Note also that the Fire Code requires primary and secondary access (2016 California Fire Code, Appendix D 107.1) and the Project is compliant.

I124-25 The comment regards potential impacts related to secondhand smoke and wildfires. CEQA does not require analysis of potential impacts related to secondhand smoke. With respect to potential wildfire hazards, 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.

I124-26 The comment regards potential impacts from objects falling out of dormitory windows. Impacts related to potential hazards are addressed as required in EIR Section 4.8, Hazards and Hazardous Materials. Beyond this, 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 Proposed Project. No further response is required.

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- I124-27** The comment regards the project's potential impacts to public services. The comment addresses general subject areas that received extensive analysis in the EIR, including Section 4.13, Public Services and Utilities. As the comment does not raise an issue specific to that analysis, no further response is required or can be provided.
- I124-28** The comment regards potential impacts related to microwaves, wi-fi radiation, etc. To the extent required by CEQA, potential impacts related to hazards are addressed in EIR Section 4.8, Hazards and Hazardous Materials. Beyond this, 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.
- I124-29** The comment regards potential impacts related to obesity, weight gain, and unhealthy eating. CEQA does not require analysis of these impact categories. The comment raises economic, social, or political issues that do not 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.

Comment Letter I125

On Mon, Jun 5, 2017 at 12:34 PM, Georg Matt <gematt@gmail.com> wrote:
Laura Shinn
Director, Facilities Planning, Design, and Construction
San Diego State University
5500 Campanile Drive
San Diego, California
92182-1624

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

I would like to express my sincere concerns about the proposed 2,600 bed mega dorms at SDSU directly west of Chapultepec Hall. The current plan will cause irrevocable harm to neighboring communities and the environment. I urge all decision makers to conduct all necessary environmental impact studies, consider all reasonable alternatives, and take into account all potential mitigation measures to avoid damages to the environment and the quality of life of SDSU's neighbors and their communities. My concerns are summarized in the following.

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.

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

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I125-5

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.

I125-5
Cont.

I125-6

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.

I125-7

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. 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

I125-8

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.

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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.

I125-9

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. 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.

I125-10

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.

I125-11

I125-12

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

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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.

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."

Sincerely,
Georg Matt

Georg E. Matt
gematt@gmail.com

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Cont.

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Response to Comment Letter I125

Georg E. Matt

June 5, 2017

I125-1 The comment is an introduction to comments that follow. No further response is required.

I125-2 The comment is an introduction to comments that follow. No further response is required.

I125-3 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. 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 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.

I125-4 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. With respect to the comment regarding environmentally preferable siting choices and the Project’s goals and objectives, the

Responses to Comments - Individuals

- 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.
- I125-5** 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.
- I125-6** Please see response to comment I125-5.
- I125-7** 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.
- I125-8** 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.
- I125-9** The California State University Board of Trustees’ prior approval of the 2007 Campus Master Plan was set aside following litigation and, therefore, the 2007

Responses to Comments - Individuals

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.

- I125-10** 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 Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. With respect to information regarding the alternative of developing 1,400 beds on Lot U (Phase I), responsive information is provided in the Alternatives Thematic Response.
- I125-11** Please see the Biological Resources Thematic Response for information responsive to this comment.
- I125-12** 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 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.
- I125-13** Please see responses to comments I125-10 and I125-11.
- I125-14** 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.
- I125-15** 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

Section 4.5, 4.7, and Appendices 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.

- I125-16** 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 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

Responses to Comments - Individuals

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. 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 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.

I125-17 Please see response to comment I125-8.

I125-18 The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. However, as previously noted, the proposed project has been modified and no longer includes Phases II and III. As a result,

Responses to Comments - Individuals

because the proposed project no longer includes Phase III, there will be no significant and unavoidable traffic impacts. 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.

I125-19 Please see response to comment I125-18,

I125-20 The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, 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.

Comment Letter I126

On Mon, Jun 5, 2017 at 1:45 PM, Nancy OSullivan <nancy.osullivan@icloud.com> wrote:

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

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

Dear Ms. Shinn,

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.

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

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2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

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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.

I126-5

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. 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.

I126-6

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.

I126-7

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

I126-8

students is not a valid reason to create non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

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I126-9

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.

I126-10

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.

I126-11

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

I126-12

Responses to Comments - Individuals

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. 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.

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."

Sincerely,

Nancy O'Sullivan
6588 Bluefield Place
San Diego, CA 92120

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

I126-12
Cont.

I126-13

I126-14

Response to Comment Letter I126

Nancy O'Sullivan

June 5, 2017

I126-1 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.

I126-2 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.

I126-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments - Individuals

- I126-4** 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.
- I126-5** 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.
- I126-6** 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.
- I126-7** 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.
- I126-8** 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 Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. With respect to information regarding the alternative of developing 1,400 beds on Lot U (Phase I), responsive information is provided in the Alternatives Thematic Response.

Responses to Comments - Individuals

- I126-9** Please see the Biological Resources Thematic Response for information responsive to this comment.
- I126-10** 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 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.
- I126-11** 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 Chapters 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.
- I126-12** 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 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 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. 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 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.

I126-13 The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. However, as previously noted, the proposed project has been modified and no longer includes Phases II and III. As a result, because the proposed project no longer includes Phase III, there will be no significant and unavoidable traffic impacts. 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.

I126-14 The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, 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.

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Comment Letter I127

On Mon, Jun 5, 2017 at 2:18 PM, Mark Nelson (Home Gmail) <menelson@gmail.com> wrote:

According to SDSU's DEIR, the expansion of SDSU student housing that leads to the construction of beds for 2600 students and the expedited destruction of Aztec Canyon (to the west of Chapultepec Hall) emanates from the Sophomore Success program. Further, the Sophomore Success program is a response to AB 1602 and the CSU's report on AB 1602 states:

"In order to address the future workforce needs of California and further improve achievement gaps, the CSU system has established ambitious revised goals for student success for 2025."

Inasmuch as the Legislature provided the CSUs with a 2025 goal, there is no reason for SDSU to be on such an environmentally damaging, breakneck pace to force through an EIR, contract a design-build firm, and irreversibly destroy an undeveloped canyon.

SDSU has no valid reason for the expedited schedule of its response to AB 1602 and its 2025 goals, and must delay its DEIR comments deadline to allow for adequate time for review of, and response to, all DEIR documents. SDSU has had preliminary designs of the preferred project since 2010, and contracted full design of the project in 2013 without disclosure to the public. As a result, SDSU must delay the DEIR comments deadline to reflect the maximum CEQA period allowable.

SDSU has no valid reason for the expedited schedule of its response to AB 1602 and its 2025 goals, and must delay its DEIR process to allow for proper environmental consideration of alternative sites, redevelopment, and site acquisition/condemnation.

I127-1

I127-2

I127-3

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Response to Comment Letter I127

Mark Nelson

June 5, 2017

- I127-1** The comment regards the Sophomore Success Program and claims the proposed project is “environmental damaging” and would “irreversibly destroy an undeveloped canyon.” Preliminarily, the comment regards the proposed project as described in the Draft EIR, which would provide housing for approximately 2,600 students and be built in three phases. However, following the close of the public comment period, and in response to agency and public comments, the project was modified to eliminate Phases II and III, and now consists of only the Phase I development. Please see Final EIR, Preface, for additional information regarding the project modifications. As a result, the proposed project would not result in direct impacts to the canyon, and all indirect impacts could be mitigated to less than significant. Beyond that, 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 Proposed Project.
- I127-2** The comment asserts SDSU has no valid reason for the current approval schedule and asserts that SDSU has had preliminary designs for the project since 2010. The comment is incorrect. 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.
- I127-3** The comment reiterates the previous comment regarding the current approval schedule, and claims that the process must be delayed to allow for proper consideration of alternative sites. However, the EIR examined a full range of alternative sites and no delay is necessary. Please see the Alternatives Thematic Response for discussion of the alternatives considered.

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Responses to Comments - Individuals

Comment Letter I128

From: <jdunne@thedunne.com>
Date: Mon, Jun 5, 2017 at 2:55 PM
Subject: SDSU Sophomore housing project EIR comment
To: ishinn@mail.sdsu.edu, president.office@sdsu.edu, provost@sdsu.edu, csu-chancellor@calstate.edu, erivera@mail.sdsu.edu, Kerri Dunne <kerri@thedunne.com>

Ms Shinn,

After attending last meeting I left shocked with respect to how SDSU has approached this project. The presentation made it clear that SDSU did not take the neighbors and the impact to the neighborhood into its assessment.

Your slides and conclusions were an embarrassment. As an example one of the first slides shown, featured a rendering computer rendering designed to "alleviate" concerns over the impact of the development. The problem is the rendering showed the buildings on the wrong side of the street. Unless you are planning on building where the baseball field is today? Traffic studies ignored any impact study on College Gardens court? No significant reptiles in the canyon? The canyon adjacent to Aztec canyon has an active California Nat catcher study taking place. Yet your study, magically, found no evidence of nat catchers in Aztec canyon. I could keep going but but what's the point.

All in all Sean Spicer has more believable presentations.

I understand that projects like this are always going to run into opposition. But what I don't understand is how SDSU seems to not care about any effects on neighborhood. This is not a small change that a few home owners are resisting. You are proposing a MAJOR Negative impact to the neighborhood. And I suspect Alvarado Estates is not aware of how much they too will be negatively affected. You took a constancy that should have been an ally. Since we all would like more student housing and less Mini dorm pressure.

Congratulation, you did the exact opposite.

Studying your decision criteria points to a faulty process.. Based on your spreadsheet, eliminating many viable locations early in the process, created the inevitable bad final decision. You eliminated what would have been better overall locations. My 5 yr daughter points to places, and wonders why you did not chose them. I suppose a parking lot to dump Xmas trees in, is much more important, than the effect on 100s of family homes.

Questions:

1. Why did your grading criteria not fully score all locations with a total score?
2. Why did you cut off many locations early in the process?
3. Who exactly was responsible for deciding which issues were important, which were not?
4. Negligable Aesthetics impact? This would be the largest structure visible from most locations San Diego! Today, from mission trails or Cowles mountain, Chappy sticks out beyond any other structure across the horizon. No matter where you look, Chappy sticks out... This project dwarfs Chappy. Please explain how that is determined to be "negligible"?
5. The traffic studies showed no effect on College Gardens CT? College Gardens CT will be become the main entry/exit into the west side campus and CVE.... This project creates a choke point. How much more traffic be shunted through this route?

Responses to Comments - Individuals

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| 6. Why was College Gardens Ct route traffic not taken into account? | I1128-9 |
| 7. How will Alvarado Estates be affected? what about the impact on their only ingress into their community? The left turn onto Yorba Santa Drive? | I1128-10 |
| 8. College Gardens CT route is already in disrepair. The canyon is falling into the road, and maintenance is constant battle. How much more traffic will there be? | I1128-11 |
| 9. SDGE has huge projects slated for the next 2-3 years along this college Gardens route. How will SDGE and SDSU construction projects accommodate each other? | I1128-12 |

based on the last meeting, the attitude of SDSU towards the neighborhood is shocking. Some people were literally in tears due to the impact this will have on their lives. The rub is that there are clearly better options. It makes no sense on the surface. I can only conclude there other motivations and priorities you are not telling us. Any common sense person can see many obvious, better ideas such as the huge lots near alvarado suites just sitting there, unused, dilapidated. But like I said, I guess space for xmas tree drop off is a higher priority?

I1128-13

This reeks of a bluff, where you want Phase 1 to pass with no hassle and scare everybody with Phase 2 and 3. Clearly SDSU has other plans for the other locations. Something stinks here.

I1128-14

Joe Dunne
5225 stone CT

Response to Comment Letter I128

Joe Dunne

June 5, 2017

- I128-1** 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.
- I128-2** 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.
- I128-3** 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.
- I128-4** 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.
- I128-5** 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.

Responses to Comments - Individuals

- I128-6** 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. However, information regarding aesthetics impacts are contained in Section 4.1, Aesthetics, 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.
- I128-7** The commentator raises concerns that development of the Project would result in “negligible aesthetic impacts.” The EIR does not determine that development of the Project would result in negligible aesthetic impacts. The aesthetic impacts of the Project are addressed in Section 4.1, of the EIR. In subsection 4.1.8, Level of Significance After Mitigation, the EIR determines that impacts to existing visual character and quality associated with Phase II and Phase III would be significant and unavoidable. However, 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. Please see Final EIR, Preface, for additional information regarding the project modifications.
- I128-8** The comment states that the traffic studies showed “no effect” in the College Gardens area. In fact, the 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 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 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, and Final EIR Figure 8-1.) For additional information responsive to this comment, please also see the responses to comments O-6-29 through O-6-32.
- I128-9** The comment asks why the College Gardens route was not taken into account. Please see the response to comment I-128-8 for information responsive to this comment.

Responses to Comments - Individuals

- I128-10** The comment asks how Alvarado Estates, through the College View Estates and College Gardens communities, will be affected. Please see the response to comment I-128-8 for information responsive to this comment.
- I128-11** 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.
- I128-12** 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.
- I128-13** 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.
- I128-14** 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.

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Comment Letter I129

Susan Richardson
5433 Hewlett Drive
San Diego, CA 92115
dprsmr@cox.net

June 5, 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

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

To start, I am an SDSU alumni, member of the Aztec Recreation Center and basketball season ticket holder. We moved to the College View Estates neighborhood in 1994, to be a part of a vibrant college community. The comments below are forwarded for input into the public comment regarding SDSU's draft EIR for proposed dorms on the west side of campus at Remington Road and 55th Street. The proposed 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, and significant environmental impacts that have feasible alternatives must be implemented under CEQA to reduce or remove damages to the environment.

I129-1

1. SDSU's aggressive project construction start date of fall of 2017 must be revised. SDSU did not even begin public engagement on the phase 2 and 3 of the proposed project until December of 2016 on a plan that was developed in 2010 and updated in 2013 without public input. In order to maintain the crisis schedule of SDSU's own making, it has eliminated environmentally preferable siting choices and mechanisms 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; 2) prohibition on demolition/rebuild of existing SDSU sites and 3) required use of undeveloped land. As a direct result of an expedited schedule and removal of valid options, SDSU's DEIR asks to certify significant, non-mitigatable and irreversible impacts that could easily be 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 a local canyon to mitigate its

I129-2

Responses to Comments - Individuals

own delays. If SDSU wanted to build a 2,600 bed, \$0.5 BILLION project it needs to build in time for environmentally responsible site selection.

I129-2
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" 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.

I129-3

3. The DEIRs Project Goals and Objectives need to 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 the western 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 canyon land in addition to other non-mitigatable, irreversible significant impacts that can be mitigated through more environmentally-responsible planning.

I129-4

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 development in a canyon and would utilize already disturbed land. SDSU ignored this already approved option for redevelopment in its current DEIR by biasing its Goals and Objectives to west campus.

I129-5

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, already disturbed space on Lot U by only placing 850 beds there. SDSU's own proposal in 2013

I129-6

placed 1,400 students in the same space. A much more efficient use of the 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.

I129-6
Cont.

6. SDSU's biological survey of the west canyon (referred to here as 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, reptiles, owls, coyotes and other plant and animal species. Other local surveys for underground 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.

I129-7

7. SDSU must conclude that any destruction of Aztec Canyon while other redevelopment sites are available is a non-mitigatable, significant and irreversible impact to the environment. SDSU correctly recognizes that intensification of land uses on 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.

I129-8

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, bio methane, 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

I129-9

Responses to Comments - Individuals

insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

1129-9
Cont.

9. SDSU’s analysis of noise impacts is inadequate, must be conducted again, and significant impacts that remain 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 failed to measure the existing sound from student residences using 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 existing 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 at Chapultepec, as well as the amplified speaker system at the ball fields, further leading to significant impacts.

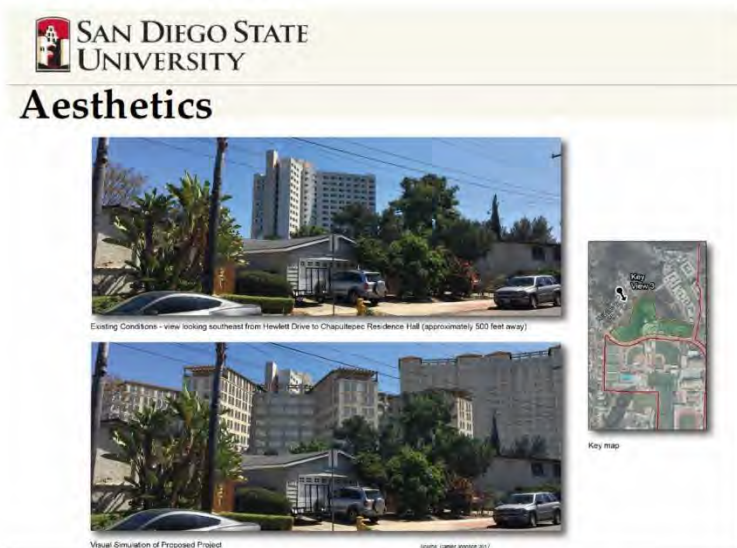
1129-10

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. Additional traffic and parking issues that will impact the neighboring community is the lack of parking and access for deliveries, guests, ride-share services and students who own cars. Currently, Remington Road is impacted daily with illegal parking in the bike lane in front of Chapultepec. In addition, student and event parking on Hewlett and Remington, in the College View Estate neighborhood, impacts the neighborhood because it is not mitigated enough with the permit area parking or the “guard” during only selected events.

1129-11

11. The project’s proposed high density Phase 2 and 3, in addition to canyon destruction is poor urban planning and is an incompatible land use that does not allow a suitable transition between single family homes and the boundaries of the project site. “The western boundary of the proposed project site directly abuts single family residential lots on the east side of Hewlett Drive”. ([http://newscenter.sdsu.edu/chapultepec-info/files/08009-Appendix B Aesthetics Technical Report Part1.pdf](http://newscenter.sdsu.edu/chapultepec-info/files/08009-Appendix%20B%20Aesthetics%20Technical%20Report%20Part1.pdf)) Below is the simulation provided by SDSU of what the project would look like from the neighboring street with buildings towering over single family homes with less than 100 feet of buffer, causing light, noise and shadowing. Phase 2 and 3 have significant and unmitigatable impacts.

1129-12



SDSU's President Elliot Hirshman also recognizes 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." I urge the University staff and trustees to ensure that any proposed project revision is open to public input and that SDSU remain a good neighbor to both the community and environment.

Sincerely,

Susan Richardson

I129-13

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Response to Comment Letter I129

Susan Richardson

June 5, 2017

- I129-1** The comment is an introduction to comments that follow. No further response is required.
- I129-2** 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.
- I129-3** 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.
- I129-4** 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.
- I129-5** 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

- I129-6** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I129-7** Please see the Biological Resources Thematic Response for information responsive to this comment.
- I129-8** 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 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.
- I129-9** 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 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 Chapters 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.

I129-10 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 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 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. 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

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 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.

I129-11 The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. However, as previously noted, the proposed project has been modified and no longer includes Phases II and III. As a result, because the proposed project no longer includes Phase III, there will be no significant and unavoidable traffic impacts. 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.

I129-12 The bulk, scale, and architectural character of the Project is analyzed in Section 4.1, Aesthetics, of the EIR. In subsection 4.1.8, Level of Significance After Mitigation, the EIR determines that impacts to existing visual character and quality associated with Phase II and Phase III would be significant and unavoidable due in part to

Responses to Comments - Individuals

anticipated high levels of contrast in scale when viewed against existing residential development (see Figures 4.1-13). Following distribution of the Draft EIR and the close of the public comment period, the 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 Phases II and III have been eliminated, and the comments, while noted, are no longer applicable. Shading and shadow impacts of the Project are also addressed in Section 4.1 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.

- I129-13** The comment is a conclusion statement referencing previous comments. No further response is required.

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Comment Letter I130

On Mon, Jun 5, 2017 at 2:33 PM, Mark Nelson (Home Gmail) <menelson@gmail.com> wrote:

SDSUs recent presentations discuss the need for contingency plans to keep their potential new residence halls with adequate revenue so as to not drag down debt service coverage. As a result, SDSUs presentations provide a number of Contingencies that SDSU might have to invoke as a result of constructing the proposed project, such as:

- Requiring upper division students to live on campus
- Housing non-SDSU students on campus
- Reducing/removing the options for the lower cost triple rooms that students use to manage their costs of living on campus
- Releasing temporary staff
- Other cost contingency actions

SDSUs presentations demonstrate that it has material concerns about its ability to fill the new housing and maintain net revenue for debt service, and as a result, SDSUs DEIR should be rejected due to the uncertainty of the need for the project and the project's revenue streams. Significant, non-mitigatable impacts cannot be predicated on a project with high uncertainty.

I130-1

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Response to Comment Letter I130

Mark Nelson

June 5, 2017

- I130-1** The comment refers to economic-related issues at “recent presentations” regarding “contingency plans,” and states the EIR should be rejected due to the “uncertainty of the need” for the project. The comment also refers to “non-mitigatable” impacts. Preliminarily, the proposed project has been modified to eliminate Phases II and III and, as a result, would not result in “non-mitigatable” impacts. Second, SDSU is confident of the financial projections supporting the project, and is unaware of any presentations demonstrating any material concern with project finances. Moreover, the referenced contingency plans affect neither the need nor the goals and objectives of the proposed project. Finally, the comment raises economic issues that do not 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 Proposed Project.

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Comment Letter I131

June 5, 2017

Edward Aguado
5433 Redding Rd
San Diego, CA 92115
edwardaguado@gmail.com

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

SUBJECT: Formal Comments for SDSU DEIR (4/21/2017)

To put this letter in context, please note that I am writing submitting it on June 5, 2017, the day before the June 6, 2017 Campus Development Committee is to be convened at 9:30 a.m. to discuss the Chapultepec project. I am a member of that committee, as I have been for the last 16 years. I have also served many terms on the SDSU Senate, six years on the CSU Academic Senate, been a full time faculty member for 35 years, and an assistant dean for four years. I know how the university works.

I131-1

I know that you will be receiving many informed and well thought out objections to the content and conclusions of the draft EIR. There will also be comments that undercut the University's alleged rationale for locating the entire development at the proposed site and the validity of the Sophomore Success Program as the genuine reason for the construction of the dorm complex. Rather than duplicate those comments I will restrict mine to address the **process** by which this project has been submitted for approval. It was strategically unsound and very much less than forthcoming.

I131-2

First is the matter of scheduling a meeting of the CDC to decide on the project mere hours after the deadline for public comments. These comments obviously cannot be digested in that ridiculously short time period, and will thus be summarily dismissed at that meeting. This is particularly striking in light of the fact that President Hirshman recognized significant and unavoidable impacts of Phases 2 and 3 of the project. The fact that he acknowledged impacts of those phases does not mean that Phase 1 does not have such effects. It truly does, but none of those problems are likely to be presented to the committee.

I131-3

Because of then-President Hirshman's withdrawal of support for Phases 2 and 3 of the project, the scheduled May meeting of the Campus Development Committee to review the proposal was pushed back to June 6. As a committee member I then sent you and the

I131-4

rest of the CDC an email asking about the type of plans we would be seeing in lieu of the original ones shown in the Draft EIR. I got the following reply from Associate Vice President Schulz:

The only thing that will be coming to the CDC in June will be Phase 1. No decisions have been made about Phases 2 & 3 where the significant impacts, and community controversy occur, and we won't be asking the CDC to approve them either. *Unfortunately we won't have those Phase 1 plans and images much before (or at all) our scheduled meeting date of June 6th.* [Italics are mine.]

We'd rather the architects had more time to prefer plans and renderings of Phase 1, and we'd rather have the time for the close of comments and have out CEQA consultants show the revisions/responses that will be incorporated to honor President Hirshman's commitment to not pursue a project EIR that has Significant non-mitigatable impacts. Unfortunately the Calendar to get Schematic Items to the Chancellor's Office for a September BOT Review means we have to show it to C.O. staff later that same week CDC meets, and I really don't want to take anything to the C.O. without running it past our CDC first.

This response is appalling. The fact that SDSU wants to present the project to the CO next week in no way justifies bypassing a legitimate and legally mandated review of the draft EIR. This response suggests an attitude that SDSU has the right to build what it wants, where it wants, and when it wants to without concern about major impacts to the natural environment and a nearby community. It further betrays a contempt for the rules of the SDSU Senate, to which any CDC proposals like this should be forwarded (you may refer to page 65 of the Senate Policy File). On the other hand, it is consistent with SDSU's record of losing law suits.

But the most absurd aspect of this is that the need for rushing the project to the CO is the result of the way the Administration has handled the release of information on this project. It is now widely known that SDSU had plans for a dorm complex essentially the same as what is now proposed as early as 2010. One doesn't need to work very hard to figure out why was this not revealed to the public and subjected to review in a more reasonable time frame.

It is obvious that SDSU just assumed this project would be rammed through regardless of whatever problems it would create and the objections that would be raised. As you mentioned in response to my question at the March 28 College View Estates meeting, the final proposal was set to go to the CSU Trustees at their September 2017 meeting. When I followed up and asked when construction was to begin, you informed us that would be in the fall of 2017, in other words at the same time. This was before a draft EIR was even prepared! Now that former President Hirshman ordered a major scaling back of the plans, you are asking the committee's blessing on advancing it to the CO without any knowledge of what would ultimately be built. I will be urging the Campus Development Committee to live up to its responsibilities and refuse to acquiesce to this.

So the bottom line is that SDSU has been the victim of its own institutional arrogance. It withheld plans for a major project that it knew about for years. It assumed that it would bulldoze its way to fruition despite the inevitable resistance that would be organized by

I131-4
Cont.

I131-5

I131-6

I131-7

Responses to Comments – Individuals

3

the nearby community and environmental organizations. And now that former President Hirshman has ordered a major retreat on two of the three phases of the project, the university is asking the CDC to approve the project without any deference given to the hundreds of pages of public response to the draft EIR.

This entire project needs to be entirely reconceived. Phases 2 and 3 are unworkable, which means Phase 1 has to be recast in light of the absence of the other two original phases. The only reasonable thing to do is withdraw the draft EIR and replace it with something that the University intends to move forward with (I am assuming Phases 2 and 3 will be dropped). This will incur a delay in the construction of the dormitory project but will enable a legitimate review process.

Sincerely,

Edward Aguado

Cc: CSU Chancellor Timothy White
Trustees of the CSU
Interim President Sally Roush

↑ I131-7
Cont.

I131-8

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Response to Comment Letter I131

Edward Aguado

June 5, 2017

- I131-1** The comment is an introduction to comments that follow. No further response is required.
- I131-2** The comment is an introduction to comments that follow. No further response is required.
- I131-3** The comment regarding President Hirshman’s May 8, 2017 statement is noted. In response to the statement, 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.
- I131-4** The comment regarding President Hirshman’s May 8, 2017 statement is noted. In response to the statement, the proposed Project has been modified to eliminate Phases II and III such that 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. Further, the Draft EIR was circulated for a 45-day public review period beginning April 21, 2017 and ending June 5, 2017. Because the Draft EIR does not contain significant new information, a new EIR or recirculation of the Draft EIR is not warranted.

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

Responses to Comments – Individuals

- resulting from each Phase of the proposed 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 EIR, that clearly would lessen the significant environmental impacts. In sum, the elimination of Phases II and III is not significant new information within the meaning of CEQA and, as such, recirculation is not required.
- I131-5** 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 proposed Project should have been included as a cumulative proposed 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.
- I131-6** 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.
- I131-7** 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.
- I131-8** The comment is acknowledged. However, the Draft EIR does not contain significant new information warranting a new EIR or recirculation of the Draft EIR. Please see response to comment I131-4 for information responsive to this comment.

Responses to Comments – Individuals

Comment Letter I132

On Mon, Jun 5, 2017 at 4:16 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:

Letter from the concerned residents of the College Area.

Name	Katie Green
Address	5434 Redding Road
Phone number	619 583-4815

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

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.

I132-1

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

I132-2

Responses to Comments – Individuals

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

I132-2
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:

I132-3

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.

I132-4

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I132-5

Responses to Comments – Individuals

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.

I132-6

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.

I132-7

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I132-8

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

I132-9

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↑ I132-9
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I132-10

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.

I132-11

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.

I132-12

Responses to Comments – Individuals

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.

I132-13

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."

I132-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShum@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I132

Katie Green

June 5, 2017

I132-1 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 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.

I132-2 The comment that the EIR is “insufficient” and that there are “feasible alternatives” 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.

I132-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I132-4** 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.
- I132-5** 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.
- I132-6** 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.
- I132-7** 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.
- I132-8** 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.
- I132-9** The comment regards the impacts of the proposed project on the adjacent canyon. Please see the Biological Resources Thematic Response for information responsive to this comment.

I132-10 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 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 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.

I132-11 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 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.

I132-12 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 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.

Responses to Comments – Individuals

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, as noted in the prior responses, the proposed Project has been modified and no longer includes the development of Phase II and Phase III.

I132-13 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, 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.

I132-14 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 I133

On Mon, Jun 5, 2017 at 4:21 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name Mytili Bala & Prashant Bharadwaj

Address 5181 College Gardens Court

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

I133-1

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.

I133-2

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:

1133-3

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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1133-6

Responses to Comments – Individuals

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Responses to Comments – Individuals

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I133-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I133

Mytili Bala and Prashant Bharadwaj

I133-1 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 Projects Fire Fuel Load Modeling Report, the Project site is within an area determined 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.

I133-2 The comment that the EIR is “insufficient” and that there are “feasible alternatives” 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.

I133-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I133-4** 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.
- I133-5** 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.
- I133-6** 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.
- I133-7** 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.
- I133-8** Information regarding the alternative of developing 1,400 beds on Lot U (Phase I) is provided in the Alternatives Thematic Response.
- I133-9** Please see the Biological Resources Thematic Response for information responsive to this comment.

- I133-10** 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 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.
- I133-11** 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 EIR, the energy use expected from project construction and operation do not pose a significant increase from historical local use. Also, the use 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 Chapters 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.
- I133-12** 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.

Responses to Comments – Individuals

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 landscaper noise. 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 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. 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.

Responses to Comments – Individuals

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, 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 II and Phase III, so no further response to this comment is necessary.

I133-13 The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. Because the proposed Project no longer includes Phase III, there will be no significant and unavoidable traffic impacts. 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.

I133-14 The comment regarding President Hirshman's May 8, 2017 statement is noted. In response to the statement, 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.

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Responses to Comments – Individuals

Comment Letter I134

On Mon, Jun 5, 2017 at 5:00 PM, Mytili Bala <mytili@gmail.com> wrote:
Dear Ms. Shinn,

My husband and I live at 5181 College Gardens Court, near the new proposed SDSU dorm. I taught a class at SDSU, and we both feel lucky to live close to a vibrant university. We support the university's efforts to expand into Mission Valley and build new on-campus student dorms. However, the current proposal to cram 2700 beds into an already cramped footprint is flawed.

I134-1

Others have written about concerns to wildlife and habitat destruction if the dorm is built in Aztec Canyon. My main concern is the impact on parking and traffic. The DEIR essentially assumes that those sophomores who currently have a car and live off campus will no longer have a car when required to live on-campus. I question this fundamental premise and believe the DEIR needs to offer support for that underlying assumption. If the assumption turns out to be reasonable, the DEIR looks at overall demand for parking instead of the distribution of parking in particular areas. Assuming students who have cars will want to park near their dorm, that will undoubtedly impact parking in our neighborhood. The DEIR therefore needs to break down anticipated parking impacts not in the aggregate (campus-wide), but rather as to our specific geographic area.

I134-2

Traffic is another concern. We already have problems with cars zooming up and down our streets to get to Montezuma through Yerba Anita. The kids on my block are mostly under 10, and this presents a safety risk. Adding 2700 beds so close to a family neighborhood will increase the traffic flow through Yerba Anita and exacerbate the existing problem.

I134-3

Finally, while I have mostly found the students who live in our neighborhood to be respectful, just this past weekend, our community block party sign was ripped down, and neighbors noticed two people shouting and skateboarding from 11:30 p.m. to 1 a.m. that night. It is not clear who did this, and I cannot definitively say that it was SDSU students. However, adding 2700 beds so close to a family neighborhood risks these types of incidents happening. I worry the Remington Dorms will make the mini-dorms in our neighborhood that much more desirable for students seeking to live off campus and result in more noise and parties in our neighborhood. My friends moved out of their home at College and Montezuma as their family neighborhood was taken over by disrespectful students who vandalized homes and strewed beer cans across their yards. Alvarado Estates became a gated community to mitigate these problems. I don't want to live in a gated community, but adding 2700 beds might force College View Estates to follow suit.

I134-4

Ultimately, while Phase 1 of the project over the existing parking lot may be reasonable, I have serious concerns about Phases 2 and 3 in the canyon. If SDSU carries out its plan, the character of our neighborhood will likely change for the worse.

I134-5

Thank you for giving us the opportunity to give feedback; I hope you take these concerns into consideration in finalizing the EIR.

I134-6

Sincerely,

Responses to Comments – Individuals

Mytili Bala
(& Prashant Bharadwaj)
Mytili Bala
mytili@gmail.com

Response to Comment Letter I134

Mytili Bala & Prashant Bharadwaj

June 5, 2017

- I134-1** The comment is an introduction to comments that follow. No further response is required.
- I134-2** The comment states that the Draft EIR “essentially assumes that those sophomores who currently have a car and live off campus will no longer have a car when required to live-on campus.” This comment misstates the analysis presented in the EIR. The trip generation rate used to calculate the number of vehicle trips that would be generated by the new resident students is based on a general overall student housing trip rate that is not specific to freshmen, sophomores, etc. (See EIR, subsection 1.14.2.6, Trip Generation.) Additionally, the assumptions made in the EIR regarding whether the new resident students would or would not have cars relate to the assessment of parking demand, how much parking would be needed based on the number of cars. In this regard, the analysis is based on the fact that approximately 32% of on-campus resident students bring a vehicle to campus. (EIR subsection 4.14.6.4, Parking Assessment.)
- I134-3** 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.
- I134-4** 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.
- I134-5** 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.
- I134-6** The comment is a conclusion statement referencing previous comments. No further response is required.

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Responses to Comments – Individuals

Comment Letter I135

On Mon, Jun 5, 2017 at 4:57 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:

Letter from the concerned residents of the College Area.

Name Dino Richardson

Address 5433 Hewllett Drive

Phone number [6194595799](tel:6194595799)

Comments

SDSU's President Elliot Hirshman also recognizes 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." I urge the University staff and trustees to ensure that any proposed project revision is open to public input and that SDSU remain a good neighbor to both the community and environment. Many of the assumptions made in this DEIR including the proposed requirement for sophomores to reside on campus should be reviewed for accuracy. I am an SDSU alum. My GPA improved while I lived off campus. The dorms can be a very noisy and distracting environment for study.

Sincerely,
Dino Richardson

I135-1

I135-2

Responses to Comments – Individuals

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

I135-3

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.

I135-4

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:

I135-5

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

I135-6

Responses to Comments – Individuals

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.

I135-6
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.

I135-7

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.

I135-8

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

I135-9

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.

I135-9
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 non-mitigatable, significant and irreversible changes. Lot U must be considered for maximum density construction only.

I135-10

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 underground 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.

I135-11

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.

I135-12

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.

I135-13

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.

I135-14

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 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.

I135-15

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

I135-16

Responses to Comments – Individuals

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.”

↑
I135-16
Cont.

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
mcollins@mail.sdsu.edu

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

Response to Comment Letter I135

Dino Richardson

June 5, 2017

I135-1 The comment is an introduction to comments that follow. No further response is required.

I135-2 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. Please see the Alternatives Thematic Response for information responsive to this comment. 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 over 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.

I135-3 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

Responses to Comments – Individuals

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.

- I135-4** The comment that the EIR is “insufficient” and that there are “feasible alternatives” 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.
- I135-5** The comment is an introduction to comments that follow. No further response is required.
- I135-6** 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 comment largely expresses the

Responses to Comments – Individuals

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.

- I135-7** 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.
- I135-8** 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.
- I135-9** 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.
- I135-10** 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.
- I135-11** 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.
- I135-12** 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 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 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.

- I135-13** 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.

- I135-14** 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 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,

Responses to Comments – Individuals

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 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 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 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

Responses to Comments – Individuals

- 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 Phase II and Phase III.
- I135-15** 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, 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.
- I135-16** 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

Comment Letter I136

On Mon, Jun 5, 2017 at 5:25 PM, Gina Patterson <bandgpatterson@gmail.com> wrote:
Hi Laura:

My name is Gina Patterson and I am writing to express my concerns for the proposed dorm project along Remington Road. I live at 5551 Drover Drive and am probably the least affected in the College View Estates by the project. Our home is probably the furthest from the project; however, I am still very concerned. While we will not be able to see the dorms from our home, I am very much concerned about the scope of the project.

I136-1

I have attended all of the meetings in regards to the project and personally support Phase One. I understand SDSU's position on the additional dorms needed on campus and agree with that position. I appreciate SDSU trying to create an environment to help their students be successful. However, the scope of both Phases 2 and 3 are unacceptable. Destroying the canyon in order create the additional housing just does not seem like the best option. I know some sites on campus were reviewed within the EIR, but not all of the sites were. It would be helpful if the community were provided a master plan from SDSU so we could understand why the additional sites were not reviewed and the projected plans for those sites. Can the community be provided the master plan?

I136-2

I136-3

I136-4

A number of my initial questions have been answered after attending all the meetings. However, I don't believe the issue of the increase in ride-sharing amongst college students was addressed. I understand that SDSU does not believe that the Sophomores living on campus will be bringing their cars and parking on campus. While I don't completely agree with that position, supposing that is the case, I believe that the number of cars and traffic will still increase in the area due to the college students using Uber, Lyft, etc. I have seen an increase in Uber and Lyft drivers coming down our cul-de-sac picking up and dropping off college students. It is a great mode of transportation in today's day and age and I expect it will be increasing in the near future. How will the dorm project take into account Uber/Lyft drivers and where will the pick-up/drop-off location be? Was ride-sharing taken into account with the traffic plan? I don't believe I saw any reference to it and not including this aspect does not seem realistic.

I136-5

If you can please respond to my inquiries, I would greatly appreciate it.

Thank you,
Gina Patterson
5551 Drover Drive
[619-675-4268](tel:619-675-4268)

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Response to Comment Letter I136

Gina Patterson

June 5, 2017

- I136-1** The comment is an introduction to comments that follow. No further response is required.
- I136-2** The comment is acknowledged and appreciated. The comment expresses general support for Phase I of the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.
- I136-3** 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.
- I136-4** 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.
- I136-5** The comment states, incorrectly, that SDSU does not believe that the Sophomores living on campus will be bringing their cars and parking on campus. The assumptions made in the EIR regarding whether the new resident students, who will be Freshman not Sophomores, would or would not have cars, relate to the assessment of parking demand, how much parking would be needed based on the number of cars. In this regard, the analysis is based on the fact that approximately 32% of on-campus resident students bring a vehicle to campus. (EIR subsection 4.14.6.4, Parking Assessment.)

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 Phase I building. Please see Final EIR, Project Description, Figure 2-11.

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Responses to Comments – Individuals

Comment Letter I137

On Mon, Jun 5, 2017 at 5:58 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:

Letter from the concerned residents of the College Area.

Name Robert Slavik

Address 5690 Meredith Ave.

Phone number [619-726-2171](tel:619-726-2171)

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

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.

I137-1

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

I137-2

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

I137-2
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:

I137-3

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.

I137-4

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.

I137-5

Responses to Comments – Individuals

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.

I137-6

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.

I137-7

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.

I137-8

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

I137-9

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.

I137-9
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.

I137-10

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.

I137-11

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.

I137-12

Responses to Comments – Individuals

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.

I137-13

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."

I137-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShum@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I137

Robert Slavik

June 5, 2017

I137-1 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 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.

I137-2 The comment that the EIR is “insufficient” and that there are “feasible alternatives” 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.

I137-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I137-4** 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.
- I137-5** 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.
- I137-6** 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.
- I137-7** 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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- I137-9** 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.

I137-10 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 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.

I137-11 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 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 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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Responses to Comments – Individuals

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 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 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 Phase III.

I137-13 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, 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.

I137-14 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 I138

From: **MIKE TABLER** <dalmador@cox.net>
Date: Mon, Jun 5, 2017 at 6:57 PM
Subject: DEIR New Student Housing Project
To: LShinn@sdsu.edu

Dear SDSU and CSU Board of Trustees,

The New Student Housing Project DEIR concludes that it will result in significant but unavoidable impact. It can be avoidable by not building Phase II and Phase III in Aztec Canyon. At the present time this provides a natural buffer between the SDSU campus and the residential community College View Estates. It is a sensitive habitat for birds and other wildlife, as well as a scenic vista.

I138-1

The scope and size of the proposed project will dwarf our community of 300+ single family homes. It is analogous to Moby Dick swallowing up the little fish around it. Aesthetically it is too imposing and totally out of character to its immediate surroundings. Phase II and III would destroy the quality of life for the residents immediately west of the project on Hewlett Drive. They will look out their windows and see only massive buildings, blocking the sun, their view and invading their privacy (hundreds of windows that would look into their yards and homes) with noise levels that would disturb their peace. They would be subjected to unacceptable levels of light pollution. Ten and twelve story buildings would tower over our community. It is too massive, dense and aesthetically ugly.

I138-2

I138-3

The DEIR does not adequately address the issue of cars.

1. Parking- At the present time Parking Lot 9 (where Phase I is to be built) is full during the semester. I took pictures on four consecutive Mondays at 10am in April and early May. Each time the lot was full with cars circling slowing hoping a spot was available. They left disappointed. It is unreasonable to assume that students won't bring cars when they live on campus, they do and they will. Yet no additional parking is planned, only eliminated.

I138-4

2. Cars and delivery trucks are constantly parked alongside the red curbs on Remington Road, most waiting to pickup or drop off a resident of Chapultepec dorm. This blocks the bike lane, forcing bikes into the car lane. During the Spring 2017 move-out there were up to 15 cars parked in the red. This could impede emergency vehicles trying to enter or exit our community. There was no official traffic study conducted on Remington Road. It is a two lane road that dead ends into College View Estates. Traffic is constant now without adding 2700 more students. If there was an emergency where the entire community had to be evacuated (i.e. wildfire or earthquake) Remington Road would be clogged and residents trapped. This must be addressed.

I138-5

Phase II could be built on 55th St, replacing outdated and underutilized two-story apartments built in the 1950's.

I138-6

Phase III could be built on the east side of College Ave replacing two original 2 story red brick dorms (as envisioned in the 2007 Master Plan). Additional space is available (now used as a

I138-7

Responses to Comments – Individuals

parking lot) on the east side of College Ave opposite the Student Union. Again, as envisioned in the 2007 Master Plan.

The East side, with the existing student housing plus the additional housing would create an ideal Freshmen/Sophomore village or community.

College View Estates is a special community. It was built in the 1950's when the school was still largely a commuter school. Over the years, many SDSU faculty and staff have called it their home. We still have a few of the original homeowners as our neighbors, as well as an increasing number of young families with small children. We range in age from 100 yrs old to newborns. We are a diverse but tight knit community that look after and care about each other. Over the years we have been a good neighbor to SDSU. Now it is time for you to reciprocate. There are alternative sites on campus.

Sincerely,

Kerry Stryker Tabler

5428 Redding Rd

San Diego, CA 92115-1133

dalmador@cox.net

↑ I138-7
Cont.

I138-8

I138-9

Response to Comment Letter I138

Kerry Stryker Tabler

June 5, 2017

- I138-1** 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.
- I138-2** The bulk, scale, and architectural character of the Project is analyzed in Chapter 4.1, Aesthetics, of the EIR. In Section 4.1.8, Level of Significance After Mitigation, the EIR determines that impacts to existing visual character and quality associated with Phase II and Phase III would be significant and unavoidable due in part to anticipated high levels of contrast in scale when viewed against existing residential development (see Figures 4.1-13). Chapter 4.1 also states that from Hewlett Drive, the Phase II and Phase III buildings would be substantially taller than existing structures in the area and would dominate the view. However, the proposed Project has been modified to eliminate Phases II and III. With these modifications, the Project will not result in significant unavoidable impacts, and all environmental impacts will be mitigated to less than significant. Please see Final EIR, Preface, for additional information regarding the project modifications. Shading and shadow impacts of the Project are also addressed in Chapter 4.1 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 refer to comment I124-5 regarding reasonable expectations of privacy impacts. Please refer to comment I124-7 regarding lighting impacts of the Project.
- I138-3** Chapter 4.1 analyzes the massive and scale of the Project. Please also refer to comment I138-2, above. The commentator's opinion that the Project is aesthetically ugly is not addressed as the perceived ugliness or beauty of a Project is not specifically considered by CEQA.
- I138-4** 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 EIR. Also, the proposed Project includes a move-in/move out zone on the north side of the building, and off-road spaces in front of the building for up to six vehicles for pick-up/drop off

Responses to Comments – Individuals

- purposes, which will eliminate the existing problem of pick-up/drop off vehicles blocking one lane of traffic on Remington Road. See Final EIR, Project Description, Figure 2-11, 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
- I138-5** The comment addresses general subject areas, which received extensive analysis in the EIR. The Project's impacts relative to emergency services access and 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.
- I138-6** 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 the Alternatives Thematic Response for information responsive to the comment.
- I138-7** With respect to the comment regarding environmentally preferable siting choices and the proposed Project's goals and objectives, please see the Alternatives Thematic Response and response to comment I138-6 for information responsive to the comment.
- I138-8** With respect to the comment regarding environmentally preferable siting choices and the proposed Project's goals and objectives, please see the Alternatives Thematic Response and response to comment I138-6 for information responsive to the comment.
- I138-9** The comment expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the EIR. For that reason, no further response to this comment is provided.

Responses to Comments – Individuals

Comment Letter I139

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

Name Greg Babick

Address 4931 College Gardens Ct.

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

I139-1

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.

I139-2

Responses to Comments – Individuals

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:

1139-3

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.

1139-4

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.

1139-5

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

1139-6

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.

I139-6
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.

I139-7

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.

I139-8

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.

I139-9

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.

I139-10

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.

I139-11

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.

I139-12

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

I139-13

Responses to Comments – Individuals

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.

I139-13
Cont.

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."

I139-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I139

Greg Babick

June 5, 2017

I139-1 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 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

I139-2 The comment that the EIR is “insufficient” and that there are “feasible alternatives” 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.

I139-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I139-4** 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.
- I139-5** 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.
- I139-6** 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.
- I139-7** 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.
- I139-8** 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.
- I139-9** 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.

I139-10 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 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.

I139-11 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 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 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.

I139-12 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 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 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 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.

Responses to Comments – Individuals

Ambient Noise Measurements Comparison

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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, as noted in the prior responses, the proposed Project has been modified and no longer includes the development of Phase II and Phase III, so no further response to this comment is necessary.

I139-13 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, 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.

I139-14 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 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 I140

On Mon, Jun 5, 2017 at 7:02 PM, Save Aztec Canyon <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	619-582-5412

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

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.

↑
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.” 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.

I140-11

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.

I140-12

Responses to Comments – Individuals

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, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I140

Michael J. Tabler

June 5, 2017

I140-1 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 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.

I140-2 The comment that the EIR is “insufficient” and that there are “feasible alternatives” 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.

I140-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I140-4** 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.
- I140-5** 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.
- I140-6** 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.
- I140-7** 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.
- I140-8** 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.
- I140-9** 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.

I140-10 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 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.

I140-11 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 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 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.

I140-12 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 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.

Responses to Comments – Individuals

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, as noted in the prior responses, the proposed Project has been modified and no longer includes the development of Phase II and Phase III, so no further response to this comment is necessary.

I140-13 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, 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.

I140-14 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 I141

From: Greg & Hilda <grilda@cox.net>
Date: Mon, Jun 5, 2017 at 7:25 PM
Subject: Aztec Canyon
To: lshimm@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 I141

Greg Babick

June 5, 2017

- I141-1** The comment is an introduction to comments that follow. No further response is required.
- I141-2** 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.
- I141-3** With respect to the comment regarding environmentally preferable siting choices and the proposed Project's goals and objectives, please see the Alternatives Thematic Response and the response to comment I141-2 for information responsive to the comment.
- I141-4** 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.
- I141-5** The comment states that any emergency will lead to gridlock, panic and loss of life, but provides no substantiation for this statement. Wildfire in the canyon was evaluated in the EIR's Fire Fuel Load Modeling Analysis technical study. It is recognized that the canyon includes terrain, fuels, and occasional weather extremes that could lead to wildfire. That expectation was considered in the Project's design, is required by state and local fire and building codes, and results in defensible structures. Evacuation of the new student housing for wildland fire would not involve the type of scenario depicted in the comment. In addition, the EIR, Chapter 4.14, Transportation/Circulation and Parking, analyzed emergency access and response times with implementation of the proposed Project and determined that the Project is not expected to increase emergency response times. Please refer to response to comment I-17-137 for additional information responsive to this comment.

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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 Wohlfel 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 2nd year live on requirement will create a financial burden/cost constraint for students.
SDSU's 2nd 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 2nd 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.

I142-4
Cont.

4. SDSU is concerned in its briefing that it will have "bait and switch claims" from its 2nd 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.

I142-5

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.

I142-6

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.

I142-7

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.

I142-8

Responses to Comments – Individuals

8. For financial pro forma modeling, SDSU assumes it "captures" 32% of sophomores in its first year of operation and 62% in its 2nd year. These reckless overestimations of what is currently a 3% rate place the university system's finances at risk.

SDSU DEIR must be rejected as its unrealistic pro forma are the basis for financial recovery. Failure to make those rosy pro formas will result in irreversible, non-mitigatable, significant impacts by having excess dorm capacity after destroying a greenfield site.

1142-9

9. SDSU asserts that the Survey of Sophomore Year Initiatives supports their decision to mandate a 2nd year live on requirement. SDSU flatly misrepresents the research, which DOES NOT make any mention of mandatory live on requirements. (http://sc.edu/fye/research/surveys/survey_instruments/files/Executive_Summaries_2008_Sophomore-Year_Initiatives.pdf)

SDSUs DEIR must be rejected as the purpose and need, leading to the DEIR objectives is false and deliberately misleading.

1142-10

10. SDSU asserts an alternative strategy to building more housing. It is "purchase or partner for additional apartments." This much less environmentally damaging alternative was withheld from the DEIR.

SDSUs DEIR must be rejected because the Alternatives analysis was incomplete and biased against options other than the proposed project. SDSU has violated its obligation under CEQA as a lead agency.

1142-11

/s/ Mark Nelson

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Response to Comment Letter I142

Mark Nelson

June 5, 2017

- I142-1** The comment is an introduction to comments that follow. No further response is required.
- I142-2** The comment states the EIR must be rejected for failing to analyze “the environmental risks posed to captive students.” However, such impacts are not impacts to the environment within the meaning of CEQA and, therefore, no such analysis is required. The comment raises economic, social or political issues that do not relate to any physical effect on the environment nor that CEQA requires an EIR to analyze. 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.
- I142-3** The comment states the EIR must be rejected “for failing to examine and balance the social and economic justice of students” related to live on-campus requirements. However, such impacts are not impacts to the environment within the meaning of CEQA and, therefore, no such analysis is required. The comment raises economic, social or political issues that do not relate to any physical effect on the environment nor that CEQA requires an EIR to analyze. 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.
- I142-4** The comment states the EIR must be rejected “because SDSU asserts that this is an economic project” and the project “cannot be certified with non-mitigatable, significant impacts for profit.” Preliminarily, in response to comments submitted on the Draft EIR, the proposed project was modified to eliminate Phases II and III and, therefore, no longer includes “non-mitigatable significant impacts.” Please see Final EIR, Preface, for additional information regarding the project modifications. The remainder of the comment raises economic, social or political issues that do not relate to any physical effect on the environment nor that CEQA requires an EIR to analyze. 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.
- I142-5** The comment states the EIR must be rejected because SDSU “recognizes a material ‘bait and switch’ risk that student performance may decline” and “the primary objective of the proposed project is at material risk.” To the extent the comment is critical of the Project’s goals and objectives, the goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for related information. Beyond that, however, the comment raises economic, social or political issues that do not relate to any physical

Responses to Comments – Individuals

effect on the environment, nor that CEQA requires an EIR to analyze. 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.

I142-6 The comment states the EIR must be denied or delayed “for lack of due process” based on an incorrect claim that SDSU has had plans to develop student housing in the area of Chapultepec Hall “since at least 2010.” Preliminarily, “lack of due process” is not an impact to the environment within the meaning of CEQA and, therefore, no such analysis is required. Moreover, 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. Beyond that, however, the comment raises economic, social or political issues that do not relate to any physical effect on the environment nor that CEQA requires an EIR to analyze. 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.

I142-7 The comment refers to on-campus sexual assault and states “if the sexual assault/rape rate cannot be mitigated to the level of the general community, the EIR must not be certified.” To the extent the comment regards the impacts of the proposed project relative to law enforcement, please see EIR Section 4.13, Public Services. Beyond that, the comment raises economic, social or political issues that do not relate to any physical effect on the environment nor that CEQA requires an EIR to analyze. 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.

I142-8 The comment states the EIR “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.” The comment raises economic, social or political issues that do not relate to any physical effect on the environment nor that CEQA requires an EIR to analyze. 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.

I142-9 The comment states the EIR must be rejected as its “unrealistic pro forma are the basis for financial recovery.” The comment raises economic issues that do not relate to any physical effect on the environment nor that CEQA requires an EIR to analyze. 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.

I142-10 The comment states the EIR must be rejected “as the purpose and need, leading to the DEIR objectives is false and deliberately misleading”. The proposed project’s goals and objectives fully comply with the requirements of the California Environmental Quality Act. Please see the Alternatives Thematic Response for information regarding the project’s goals and objectives that is responsive to the comment. To the extent the comment is referring 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 over 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.

However, the comment cites to two studies that did not research the connection between on campus living and sophomore students and, instead, focused on only first year students; that studied the relationship between living arrangements (singles, doubles, suite style room accommodations) and student engagement, and not time in years spent living on campus; that “did not investigate persistence, academic gains, satisfaction, or other important outcomes that have been found to have a positive relationship with living on campus”; and, that determined based on research conducted that residence halls have the potential to positively impact the student experience. The remainder of the comment raises economic, social or political issues that do not relate to any physical effect on the environment. The comment will be

Responses to Comments – Individuals

included as part of the record and made available to the decision makers prior to a final decision on the Proposed Project. No further response is required.

- I142-11** The comment states the EIR must be rejected because the Alternatives analysis was incomplete and biased. The Alternatives analysis complies with CEQA's requirements. Please see the Alternatives Thematic Response for information responsive to the comment.

Comment Letter I143

On Mon, Jun 5, 2017 at 8:12 PM, Mark Nelson (Home Gmail) <menelson@gmail.com> wrote:
The DEIR provides no valid analysis of traffic pattern changes from Montezuma/Yerba Santa Dr to Remington Road. As a result the only valid assumption to make is that significant impacts will occur due to adding the equivalent of over 1000 homes of people, primarily of driving age, to west campus.

As a mitigation, SDSUs DEIR must find that an SDSU-funding and maintained access gate must be installed at the entrance sign to CVE on Remington Road. The gate will be down, 24/7 365 in a locked fashion, accessible only to CVEA residents. SDSU will bear all costs associated with the gating as part of its mitigation.

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1143-1
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Response to Comment Letter I143

Mark Nelson

June 5, 2017

I143-1 The comment is critical of the trip distribution within the College View Estates/College Gardens neighborhood that was utilized in the EIR traffic analysis, EIR, Chapter 4.14, Transportation/Circulation and Parking. However, 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. Specific to the neighborhood referenced in the comment, based on the results of the SANDAG traffic model, the traffic engineer determined that two percent of Project traffic would access the Project site from the west, through the College Gardens area; thus, traffic through the College Gardens area was considered as part of the analysis. The Project traffic distribution, as derived through application of the SANDAG traffic model, is illustrated on 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, and Final EIR Figure 8-1.) For additional information responsive to this comment, please also see the responses to comments O-6-29 through O-6-32.

The comment also suggests mitigation requiring SDSU to fund and maintain an access gate at the entrance to College View Estates on Remington Road. However, since the proposed project would not result in significant traffic-related impacts in the neighborhood, no mitigation is required. Additionally, increased illegal and night time parking was addressed in EIR 4.14.6.4, College View Estates Spillover Parking. The analysis notes that as part of the Project, a permanent sign on Remington Road at the SDSU campus boundary with the College View Estates neighborhood will be installed to curtail campus spillover parking in the neighborhood. In addition, parking guards will continue traffic posts at that location to discourage parking in the residential neighborhood during events at Viejas Arena and during baseball games.

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Responses to Comments – Individuals

Comment Letter I144

On Mon, Jun 5, 2017 at 8:57 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name	Hannah C Green
Address	5434 Redding Rd
Phone number	6195171195

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

I144-1

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

I144-2

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

↑
I144-2
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:

I144-3

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 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.

I144-4

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.

I144-5

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.

1144-6

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.

1144-7

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.

1144-8

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

1144-9

Responses to Comments – Individuals

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.

↑
I144-9
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.

I144-10

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.

I144-11

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.

I144-12

Responses to Comments – Individuals

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.

1144-13

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."

1144-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I144

Hannah C. Green

June 5, 2017

I144-1 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 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.

I144-2 The comment that the EIR is “insufficient” and that there are “feasible alternatives” 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.

I144-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I144-4** 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.
- I144-5** 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.
- I144-6** 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.
- I144-7** 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.
- I144-8** 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.
- I144-9** 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.

I144-10 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 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.

I144-11 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 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 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.

I144-12 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 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.

Responses to Comments – Individuals

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, as noted in the prior responses, the proposed Project has been modified and no longer includes the development of Phase II and Phase III.

I144-13 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, 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.

I144-14 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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On Mon, Jun 5, 2017 at 8:58 PM, Michael Hornbake <michael.l.hornbake@gmail.com> wrote:
Ms. Laura Shinn
Director Facilities Planning, Design and Construction, SDSU

San Diego State University's (SDSU) total disregard for the environmental, privacy and quality of life issues of its neighbors to the west of campus, appears to be designed to place the residents of College View Estate on notice that their community is about to be destroyed and assumed by the State University system. If this is the case, the California State University System should be sued for the loss in property values it will cause by building this Remington Dorns Complex project.

SDSU should not trash the green space that defines its boundary, but should make use of undeveloped/underdeveloped sites that exist on campus. These can be found at the practice soccer field north of Parking Structure 12 on Canyon Crest Drive, and in the huge paved space that is Parking Lot X, also on Canyon Crest Drive at the north edge of the campus. This last site would allow space for dormitories sufficient to house all freshmen as well as new parking structures. This site is also directly accessible to Interstate Highway Five at College Avenue without driving through a residential neighborhood. Another excellent site is Parking Lot D on Alvarado Road. All three of these sites meet all design criteria, except the completely artificial requirement that the dormitory complex be located on the west side of the campus, next to an existing dorm.

The scale of this project presented by The California State University System and SDSU at public meetings and on the internet, is the same scale as the gargantuan Hotel-Casinos built on the Las Vegas Strip and is totally inappropriate for the community where SDSU is located. If such a project were built at one of the sites stated in the paragraph above, the project would not dominate San Diego to the ocean's horizon, or east to the mountains.

If the Dormitory Complex on Remington Road is built where currently planned, SDSU should construct and staff a gate at its west boundary, on Remington Road, to preclude the impact of a dramatically increased student population and the attendant increase in automobile traffic at that point on campus. The gate should eliminate non-College View Estate resident students from exiting through or entering SDSU from that neighborhood. If SDSU believes that the increased automobile traffic associated with this project is negligible, diverting this negligible traffic through campus via 55th Street should pose no problem.

The population of SDSU already exceeds 30,000 people. At what point does the State University System decide that its function is not to compete against, eliminate or destroy the communities in which it resides? It is time to seriously consider SDSU Otay Mesa, or some other vacant site.

To design a construction project that trashes the property values of its immediate neighbors in secret and then spring it on the community at the last minute with the intent of steamrolling the project through, shows those responsible for designing and implementing this project to be brazen thugs who use their status as a state sponsored entity to abuse citizens who pay taxes that support the California State University System. Ironically, many of the residents of the negatively impacted College View

I145-1

I145-2

I145-3

I145-4

I145-5

I145-6

I145-7

Responses to Comments – Individuals

Estates neighborhood are current and retired SDSU professors and staff members and alumni.

It is not too much to expect the California State University System and SDSU to act responsibly in the community.

Michael Lombardi
Home Owner, College View Estates

↑ I145-7
Cont.
↓ I145-8

Response to Comment Letter I145

Michael Hornbake

June 5, 2017

- I145-1** 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.
- I145-2** 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.
- I145-3** With respect to the comment regarding environmentally preferable siting choices and the proposed Project's goals and objectives, please see the Alternatives Thematic Response and the response to comment I145-2 for information responsive to the comment.
- I145-4** 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.
- I145-5** The comment suggests that a gate be constructed and staffed at the entrance to the College View Estates neighborhood to preclude the impact of increased automobile traffic through the neighborhood. Preliminarily, the geographic distribution of vehicle trips generated by the proposed New Student Housing project, which was determined using the SANDAG travel demand model, showed that approximately 98% of Project generated traffic would drive east on Remington Road or Canyon Crest Drive, while only approximately 2% would drive west on Remington, into the College View Estates neighborhood. Additionally, increased illegal and night time parking was addressed in EIR 4.14.6.4, College View Estates Spillover Parking. The analysis notes that as part of the Project, a permanent sign on Remington Road at the SDSU

Responses to Comments – Individuals

campus boundary with the College View Estates neighborhood will be installed to curtail campus spillover parking in the neighborhood. In addition, parking guards will continue traffic posts at that location to discourage parking in the residential neighborhood during events at Viejas Arena and during baseball games. In sum, because the proposed project would not result in significant impacts within the College View Estates neighborhood, construction and staffing of a gate as mitigation is not required.

- I145-6** 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.
- I145-7** 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.
- I145-8** 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 EIR. For that reason, no further response to this comment is provided.

Comment Letter I146

On Mon, Jun 5, 2017 at 10:30 PM, ALICIA WOLF <alicia.m.wolf13@gmail.com> wrote:
Ms. Shinn,

The CVEA community has expressed many concern regarding the SDSU Remington Road Dorm Complex project scale and location.

I146-1

Along with my concern on those issues, is whether sufficient non-student adult onsite supervision is planned to manage the social issues that arise when several hundred 17-19 year old individuals inhabit a dorm complex of the size this project plan indicates. Though older student residential advisors serve a valuable function in freshman dorm life, mature judgement cannot be expected to have sufficiently developed, in many instances, to appropriately manage or report bullying and other inappropriate behavior to SDSU housing management.

I146-2

Regardless of where additional freshman housing is ultimately located, sufficient adult non-student staff needs to be resident onsite 24/7 to recognize and appropriately address such issues. Respectful behavior of the students toward each other and the contiguous residential community members are critical elements to a successful project .

I146-3

Thank you for your consideration of my comments,

Alicia Wolf
CVEA Resident and Homeowner

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Response to Comment Letter I146

**Alicia Wolf
June 5, 2017**

- I146-1** The comment is an introduction to comments that follow. No further response is required.
- I146-2** The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. However, for information purposes only, SDSU maintains a ratio of one residential advisor to forty student, plus one hall director, one faculty member, and two graduate students. 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.
- I146-3** 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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Responses to Comments – Individuals

Comment Letter I147

On Mon, Jun 5, 2017 at 10:33 PM, <jfuntas@cox.net> wrote:
Dear Ms. Shinn and Whom it may concern,

I've been a resident in College View Estates since 1998. In that time, I have seen the changes made on 55th Street to Remington Road due to SDSU expansion. With each new expansion project, there is an additional amount of traffic placed on 55th Street, Remington and Yerba Santa.

- No matter how many Police and traffic managers are added each year it appears little has been done to solve the real problem as it relates to the increased amount ingress/egress into the area for pedestrians and vehicles. Sometimes it takes an hour to go a mile on Montezuma rd. Not cool. No other place in SD is like this, even the stadiums.
- Event attendees, football players and students jaywalk in between these lights all the time. Why wasn't a pedestrian bridge/tunnel built when the pools, field and parking when they were added on the other side of 55th street (like College Ave)?
- There are so many drivers confused by seeing 4 traffic lights in such short proximity on 55th, they see a green light ahead and run the red light they are at. Very unsafe.
- MTS illegally parks their buses in the red curbed areas on 55th, forcing two lanes of traffic into one.
- GPS apps are forcing event traffic through the "back streets" of CVEA via Yerba Santa. It's a shame to see fellow Residents, their Kids and pets get run over because of bad planning.
- I've seen the expansion plans and this all gets much worse.

Thank you for taking the time to read and record my views for the record regarding the Aztec Canyon Dorm Expansion Project.

Sincerely,

James Funtas
5445 Redding Rd.
San Diego, CA 92115
[619-265-7574](tel:619-265-7574)
jfuntas@cox.net

I147-1

I147-2

I147-3

I147-4

I147-5

I147-6

I147-7

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Response to Comment Letter I147

James Funtas

June 5, 2017

- I147-1** 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.
- I147-2** The comment addresses transportation-related subject areas, which received extensive analysis in the EIR. The Project's impacts relative to traffic were addressed and analyzed in Section 4.14, Transportation/Circulation and Parking, of the EIR. However, because the comment does not raise any specific issue regarding that analysis, 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.
- I147-3** 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.
- I147-4** 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.
- I147-5** 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.
- I147-6** 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.

Responses to Comments – Individuals

I147-7 The comment is a conclusion statement referencing previous comments. No further response is required.

Responses to Comments – Individuals

Comment Letter I148

On Mon, Jun 5, 2017 at 10:52 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name Serenity Phillips

Address 27752 Hidden Trail Road Laguna Hills, CA 92653

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

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.

I148-1

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.

I148-2

Responses to Comments – Individuals

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:

I148-3

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.

I148-4

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.

I148-5

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

I148-6

Responses to Comments – Individuals

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.

I148-6
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.

I148-7

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.

I148-8

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.

I148-9

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.

I148-10

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.

I148-11

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.

I148-12

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

I148-13

Responses to Comments – Individuals

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.

I148-13
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."

I148-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I148

Serenity Phillips

June 5, 2017

I148-1 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 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.

I148-2 The comment that the EIR is “insufficient” and that there are “feasible alternatives” 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.

I148-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I148-4** 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.
- I148-5** 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.
- I148-6** 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.
- I148-7** 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.
- I148-8** 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.
- I148-9** 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.

I148-10 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 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.

I148-11 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 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 Section 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.

I148-12 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 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 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 Phase II and Phase III.

I148-13 The significant and unavoidable traffic impacts referenced in the comment would occur with implementation of Phase III. However, as previously noted, 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 included as part of the record and made available to the decision makers prior to a final decision on the Project.

I148-14 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 I149

On Mon, Jun 5, 2017 at 10:54 PM, Save Aztec Canyon <residents.college.area@gmail.com> wrote:
Letter from the concerned residents of the College Area.

Name Julia Wheeler

Address 5054 67th Street 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

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.

I149-1

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.

I149-2

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:

I149-3

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.

I149-4

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.

I149-5

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

I149-6

Responses to Comments – Individuals

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.

I149-6
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.

I149-7

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.

I149-8

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.

I149-9

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.

1149-10

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.

1149-11

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.

1149-12

Responses to Comments – Individuals

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.

I149-13

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."

I149-14

Sincerely,

// Name at top of document is submitters name

FULL EMAIL LIST: LShinn@mail.sdsu.edu, TWhite@Calstate.edu,
TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu,
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 I149

Julia Wheeler

June 5, 2017

I149-1 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 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.

I149-2 The comment that the EIR is “insufficient” and that there are “feasible alternatives” 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.

I149-3 The comment is an introduction to comments that follow. No further response is required.

Responses to Comments – Individuals

- I149-4** 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.
- I149-5** 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.
- I149-6** 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.
- I149-7** 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.
- I149-8** 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.
- I149-9** 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.

I149-10 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 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.

I149-11 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 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 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.

I149-12 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 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.

Responses to Comments – Individuals

Ambient Noise Measurements Comparison

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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, as noted in the prior responses, the proposed Project has been modified and no longer includes the development of Phase II and Phase III.

I149-13 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, 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.

I149-14 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 I150

5417 Hewlett Drive
San Diego, CA 92115

May 19, 2017

Chancellor Timothy White
Trustee Steven Stepanek
Trustee Peter Taylor
c/o Trustee Secretariat
by email to TrusteeSecretariat@CalState.edu
by email to TWhite@CalState.edu

Dear Chancellor White and Committee Chairs:

Subject: Suspension of Approval of SDSU Actions during May 23-24, 2017 Meeting

San Diego State is in the midst of a Draft EIR to expand student housing. As a result, it is seeking alternative locations for developing freshman housing. This is a requirement of the CEQA process with the legislative intent to provide maximum protection to the environment. SDSU Planning heavily biased both the selection of alternative in the CEQA document, as well as, the scoring of the alternatives. As a result, SDSU Planning and its DEIR have come to erroneous decisions regarding the preferred alternative and reasonable alternatives.

I have provided general letter to the Trustees about this issue, and I am also speaking at the public input time on May 24, 2017.

During this meeting, the Trustees are being asked to approve plans, approve financing, and approve a revision to the SDSU campus plan that is not even posted on SDSUs website, nor has it been socialized with community. Because the approval of these actions could cause irreparable damage to the environment by removing sites from the alternatives process for the April 21, 2017 DEIR, the approval of the actions below should be suspended pending completion of the CEQA process for SDSUs new residence halls related to the Sophomore Success program. SDSU completed the underlying for its current DEIR in 2010¹ (original west campus work by landLab and Carrier Johnson) updated it in 2013 (Carrier Johnson) and again in 2016 before dropping it on the public for Christmas of 2016. SDSU has had over 6 years of time, I am only asking for months of delay to sort out project alternatives in the DEIR by keeping the Tula/Tenochca site as an alternative, suspending associated funding, and suspending approval of the 2016 campus update, that like the plans for the west campus housing, was never socialized with the public.

The following action should be suspended, and current approvals should be denied:

1. The San Diego State University Master Plan Revision dated May 2017 (SHOULD BE SUSPENDED)
2. The project will benefit the California State University (SHOULD BE SUSPENDED).
3. The 2016-2017 Capital Outlay Program is amended to include \$24,000,000 for preliminary plans, working drawings, and construction for the San Diego State University Tula/Tenochca Replacement project. (SHOULD BE SUSPENDED)

I150-1

I150-2

I150-3

I150-4

I150-5

I150-6

I150-7

I150-8

Responses to Comments – Individuals

4. The schematic plans for the San Diego State University Tula/Tenochca Replacement project are approved at a project cost of \$24,000,000 at CCCI 6255. (SHOULD BE SUSPENDED)

1150-9

The California Legislature crafted CEQA to provide maximum protection for the environment. It entrusted state and local agencies to act in the best interest of the environment and execute CEQA faithfully. Please do so, and suspend the aforementioned actions pending both public review of the amended campus plan and completion of the full, faithful CEQA process at SDSU for housing and alternative locations associated with the Sophomore Success program.

1150-10

Sincerely,

Mark Nelson
Member – College View Estates Association, NRDC, EDF, Nature Conservancy, Sierra Club

1. From landLAB, a subcontractor to Carrier Johnson and a contributor on other SDSU project



I150-6
Cont.

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Response to Comment Letter I150

Mark Nelson

May 19, 2017

- I150-1** The comment states the EIR Alternatives analysis is biased and reaches erroneous conclusions. Preliminarily, in response to the public comments on the Draft EIR, the proposed project has been modified to eliminate Phases II and III from development. Therefore, the proposed project is now, effectively, the Reduced Density Alternative, which the EIR identified as the environmentally superior alternative. For additional information regarding the EIR Alternatives analysis, please see the Alternatives Thematic Response. Beyond that, 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.
- I150-2** The comment states that a letter regarding this issue has been submitted to the CSU Board of Trustees. The comment is an introduction to comments that follow; no further response is required.
- I150-3** The comment is directed to the CSU Board of Trustees and refers to their consideration of the then-pending SDSU Tula/Tenochca project; the comment states that approval of that project would remove sites from consideration within the current EIR's Alternatives analysis. Tula/Tenochca, a separate project from the currently proposed student housing project, involved the replacement of an existing structure with new structures of substantially the same size, purpose, and capacity. In response to the comment, EIR Section 6, Alternatives, considered a comprehensive range of alternatives and alternative locations and, in doing so, fully complies with CEQA in this regard; no additional alternatives or alternative locations are required to be considered or analyzed. For additional information regarding this subject, please see the Alternatives Thematic Response.

The comment also claims, incorrectly, 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.

Responses to Comments – Individuals

- I150-4** The comment requests “months of delay to sort out project alternatives in the DEIR.” Please see response to comment I150-3 for information responsive to the comment.
- I150-5** The comment requests that certain actions relating to the Tula/Tenochca project, those specifically listed in comments I150-6 through I150-9, be suspended, and that current approvals be denied. However, as noted above, the EIR considers an adequate range of alternative locations without inclusion of the Tula/Tenochca site. The comment expresses the opinions of the commentator, 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.
- I150-6** Please see response to comment I150-5 for information responsive to this comment.
- I150-7** Please see response to comment I150-5 for information responsive to this comment.
- I150-8** Please see response to comment I150-5 for information responsive to this comment.
- I150-9** Please see response to comment I150-5 for information responsive to this comment.
- I150-10** The comment reiterates the prior request that the Tula/Tenochca project approvals be denied. Please see the prior responses to comments for information responsive to this comment.

Responses to Comments – Individuals

Comment Letter I156

From: Jean Hoeger [mailto:neighborhoodcodecvea@cox.net]
Sent: Sunday, May 21, 2017 7:21 AM
To: White, Timothy <twhite@calstate.edu>
Subject: San Diego State Expansion Plans

Below is a letter written by a member of the community that I live in, College View Estates. Rather than reinventing the wheel, I am simply going to state that I am in full support of all that Mr. Nelson states in the letter and all that he will be stating when he speaks before your body this week.

I156-1

Jean Hoeger
College View Estates Association
College Area Community Council

Responses to Comments – Individuals

5417 Hewlett Drive
San Diego, CA 92115

May 19, 2017

Chancellor Timothy White
Trustee Steven Stepanek
Trustee Peter Taylor
c/o Trustee Secretariat
by email to TrusteeSecretariat@CalState.edu
by email to TWhite@CalState.edu

Dear Chancellor White and Committee Chairs:

Subject: Suspension of Approval of SDSU Actions during May 23-24, 2017 Meeting

San Diego State is in the midst of a Draft EIR to expand student housing. As a result, it is seeking alternative locations for developing freshman housing. This is a requirement of the CEQA process with the legislative intent to provide maximum protection to the environment. SDSU Planning heavily biased both the selection of alternative in the CEQA document, as well as, the scoring of the alternatives. As a result, SDSU Planning and its DEIR have come to erroneous decisions regarding the preferred alternative and reasonable alternatives.

I have provided general letter to the Trustees about this issue, and I am also speaking at the public input time on May 24, 2017.

During this meeting, the Trustees are being asked to approve plans, approve financing, and approve a revision to the SDSU campus plan that is not even posted on SDSU's website, nor has it been socialized with community. Because the approval of these actions could cause irreparable damage to the environment by removing sites from the alternatives process for the April 21, 2017 DEIR, the approval of the actions below should be suspended pending completion of the CEQA process for SDSU's new residence halls related to the Sophomore Success program. SDSU completed the underlying for its current DEIR in 2010¹ (original west campus work by LandLab and Carrier Johnson) updated it in 2013 (Carrier Johnson) and again in 2016 before dropping it on the public for Christmas of 2016. SDSU has had over 6 years of time, I am only asking for months of delay to sort out project alternatives in the DEIR by keeping the Tula/Tenochca site as an alternative, suspending associated funding, and suspending approval of the 2016 campus update, that like the plans for the west campus housing, was never socialized with the public.

The following action should be suspended, and current approvals should be denied:

1. The San Diego State University Master Plan Revision dated May 2017 (SHOULD BE SUSPENDED)
2. The project will benefit the California State University (SHOULD BE SUSPENDED).
3. The 2016-2017 Capital Outlay Program is amended to include \$24,000,000 for preliminary plans, working drawings, and construction for the San Diego State University Tula/Tenochca Replacement project. (SHOULD BE SUSPENDED)

1

I156-2

Responses to Comments – Individuals

4. The schematic plans for the San Diego State University Tula/Tenochca Replacement project are approved at a project cost of \$24,000,000 at CCC# 6255. (SHOULD BE SUSPENDED)

The California Legislature crafted CEQA to provide maximum protection for the environment. It entrusted state and local agencies to act in the best interest of the environment and execute CEQA faithfully. Please do so, and suspend the aforementioned actions pending both public review of the amended campus plan and completion of the full, faithful CEQA process at SDSU for housing and alternative locations associated with the Sophomore Success program.

Sincerely,

Mark Nelson
Member – College View Estates Association, NRDC, EDF, Nature Conservancy, Sierra Club



I156-2
Cont.

1. From landLAB, a subcontractor to Carrier Johnson and a contributor on other SDSU project



I156-2
Cont.

Response to Comment Letter I156

Jean Hoeger

May 21, 2017

- I156-1** The comment is an introduction to comments that follow. No further response is required.
- I156-2** The comments are a copy of the comments submitted as Comment Letter I150. Please see the responses to Comment Letter I150 (I150-1 – I150-10) for information responsive to the comment.

INTENTIONALLY LEFT BLANK

Responses to Comments – Individuals

Comment Letter I157



Laura Shinn <lshinn@mail.sdsu.edu>

DEIR Comments - 640 Petition Signatures Against SDSUs Destruction of Aztec Canyon

1 message

Mark Nelson (Home Gmail) <menelson@gmail.com>

Sat, Jun 3, 2017 at 6:04 PM

To: Laura Shinn <lshinn@mail.sdsu.edu>

Cc: twhite@calstate.edu, Trustee Secretariat <TrusteeSecretariat@calstate.edu>, President's Office <presoffi@mail.sdsu.edu>, presidents.office@sdsu.edu, mcollins@mail.sdsu.edu

The attached letter and two attachments represent DEIR comments. 640 local residents and environmentalists signed to oppose SDSUs destruction of Aztec Canyon west of Chapultepec Hall.

I157-1

3 attachments



Online Petitions Against SDSU Destruction of Aztec Canyon.png
231K

I157-2



DEIR Comments - Petitions against Aztec Canyon destruction.pdf
181K



Hand Signed Petitions Against SDSU Destruction of Aztec Canyon.pdf
760K

Responses to Comments – Individuals

Mark Nelson
5417 Hewlett Drive
San Diego, CA 92115
menelson@gmail.com

June 3, 2017

Laura Shinn
San Diego State University
LShinn@mail.sdsu.edu

SUBJECT: DEIR Comment - Signed and Online Petitions Against SDSUs Canyon Destruction

Attached are pages of signed petitions with 185 signatures, and a copy of the online petition, showing its 455 signatories. All said, 640 people in the adjoining and environmental community banded together to oppose SDSUs plan to build 11 to 14 story housing in Aztec Canyon to the west of Chapultepec Hall.

The petitions have been presented to Governor Brown's office as well.



Sincerely,

Mark Nelson

Attachments: Petitions, Petition Summary

Responses to Comments – Individuals

PETITION TO GOV. BROWN – STOP SDSU FROM KILLING THE CANYON!
 SDSU proposes to destroy a pristine canyon with its endangered species and scenic vistas to build 14 story tall Las Vegas-style dorms that they could build on top a parking lot on the campus instead. Please don't let SDSU destroy the canyon! It's one of the last places on campus with trees and it's part of a natural ecosystem that supports greenhouse gas reduction and many plants and animals.

Also Available at <https://www.ipetitions.com/petition/save-sdsu-canyon>

	PRINT Name + SIGNATURE	Address	Email	Phone
1	HENRY BERTRAM <i>Henry Bertram</i>	5351 SAXON	HANKSANDIE@GMAIL.COM	619-287-3847
2	MARY KING <i>Mary King</i>	5163 Walsh.	hking@yaleo.com	619-287-3644
3	Norma John Maynard <i>Norma John Maynard</i>	5473 Drovers Dr	J Maynard@cox.net	619-287-5051
4	BILL BROPHY <i>Bill Brophy</i>	5209 STONE COURT 92115	BROPHY@COX.NET	858-349-7799
5	Helene Guepky <i>Helene Guepky</i>	5209 Stone Ct.	Helene42@Lup.pl	619-887-5056
6	Karen Jorgensen <i>Karen Jorgensen</i>	5049 Yerba Anillo	KJorgensen@cox.net	619 796-2973
7	Mary Jane Walcher <i>Mary Jane Walcher</i>	2860 Copley Ave		619 2803051
8	Kevin Jorgensen <i>Kevin Jorgensen</i>	5049 Yerba Anillo	Kjorgensen@gmail.com	(619) 582.3736
9	DOUGLAS FORD <i>Douglas Ford</i>	CP CA 92101 1240 INDIAN ST #2400	DOUG.FORD@M.F.COM	619 743-3673
10	Darlene Shaw <i>Darlene Shaw</i>	SD 92101 1478 Knapp Sch Dr		858-272-3046
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1157-5

SAVE AZTEC CANYON

We the undersigned want San Diego State University (SDSU) to preserve this canyon/open space and not build five 11 and 14 story dorm structures in it. We support and urge SDSU to build additional student housing on alternative sites that are available on campus.

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Name	Signature	E-Mail	Date	Affiliation
Louisa J. Hall		ljhall@rail.sdsu.edu	4/25/17	Professor
Fachal Rupp		rareyes427@gmail.com	4/26	
Allison Kuykendall		alliekuy@icloud.com	4/26	
Miranda Voss		mvoss14@gmail.com	4/26	Student
Krista Griva-Neel		kgwviced@kpbs.org	4/26	Staff
Tamara Clark		t.kitty2@yahoo.com	4/26	Student
Corinne Harton		corinneharton@gmail.com	4/26	Student
Amy Bosler		abosler@kpbs.org	4/26/17	Staff
Rebecca Langon		rebecca.langon@gmail.com	4/29/17	Student
Camryn Armstrong		camrynarmstrong@gmail.com	4/29/17	Student
Brittany Lenderman		britlend@yahoo.com	4/29/17	Student
Holly Vaughn		hollyvaughn2@gmail.com	4/29/17	Student
Giuliana Gill		guliengill10@gmail.com	4/29/17	Student
Dana Glaser		deedee27@gmail.com	4/29/17	Student
Tal Shoshon		talshoshon@gmail.com	4/29/17	Student
Bryce Moore		Bryce.moore.2309@gmail.com	4/29/17	Student

1157-5
Cont.

Responses to Comments – Individuals

SAVE AZTEC CANYON

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Name	Signature	E-Mail	Date	Affiliation
Daniel Romero		hamlover27@hotmail.com	4/29	Student
AlYSSA ANDRE		aandres9610@yahoo.com	4/30	Student
Cassidy Smith		cas2715@gmail.com	4/30	Student
ZAKIYAH SHAHEED		HANIKAZW@gmail.com	4/30	STUDENT
Tobias Oliver		tobiasoliver97@gmail.com	4/30	Student
Blaze Bird		blaze.bird1788@gmail.com	4/30	Student
Mackenzie Cottle		mackcottle@gmail.com	4/30	Student
Joshua Wang		joshwang08@gmail.com	4/30	Student
Jackson Ziegler		jgzaiax@gmail.com	4/30	Student
Richard Lunil		richardkiplund@gmail.com	4/30	Student
Margie Kitano		Kitano@mail.sdsu.edu	5/1	Emerita
Arison Ross		arossdt@mail.sdsu.edu	5/1	Emerita
Bobbie J. ATKINS		bATKINS@mail.sdsu.edu	5/1	Emerita
Noah Silva		noahsilva@gmail.com	5/4	SDSU independent contractor
Karl Feyer		feyerpm@gmail.com	5/4	ARC user














1157-5
Cont.

Responses to Comments – Individuals

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Name	Signature	Email	Date	Affiliation
Thine Johnson		xxgachipinx@hotmail.com	4/25	SDSU
Kyle Bhumus		km012@hotmail.com	4/25	SDSU
Alexandra Ekesser		alexekes@gmail.com	4/26	SDSU
Amrita Joshi		amritajoshi.281@gmail.com	4/26	SDSU
Cadevin Keating		cadevin.keating94@gmail.com	4/26	SDSU
Jenna Crasthuaithe		jenna.crasthuaithe@gmail.com	4/26	SDSU
Kylie Capps		kylie.capps@gmail.com	4/26	SDSU
Edardo Cuan		edardo.cuan57@gmail.com	4/26	SDSU
Treayee Hung		treayee@hotmail.com	4/26	SDSU
Xiaoping Chen		xiap@sdsc.edu	4/26	SDSU
Zhenen Fan		zhenenfan198@gmail.com	4/26	SDSU
Annie Phan		anniephan898@gmail.com	4/26	SDSU
Mengjie Ren		menjie9924@gmail.com	4/26	SDSU
Junyang Shi		shenjunyang@gmail.com	4/26	SDSU
David Shui		dshui@gmail.com	4/26	SDSU
Yuan Hi Chung		hyuklav@gmail.com	4/26	SDSU

1157-5
Cont.

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[illegible]

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Cont.

Responses to Comments – Individuals

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Name	Signature	Email	Date	Affiliation
Torrye Hagan			5/13/17	resident
Patrice Coxman			5/13/17	resident
Matthew Hagan			5/13/17	resident
Anne Reichman		gamma.lana@sdsc.edu	5/16/17	Resident
Viola Lee			5/16/17	Resident
James Lee			5/16/17	Resident
WILLIAM STRIKER		5/16/17	5/16/17	RESIDENT
RICH WANG		WANGRICH@YSDU.ORG	5/16/17	resident
J. Carrera			5/16/17	Resident
Barbara Filmer		renifb@gmail.com	5/17/17	Resident
GORDON SCHLES		LBV@ATT.NET	5/17/17	RESIDENT
Bob Schlesinger		bdosleu@att.net	5/17/17	Resident

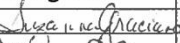


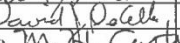
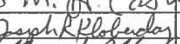
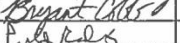
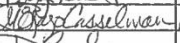
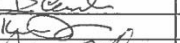
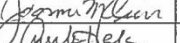
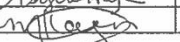






I157-5
Cont.

Responses to Comments – Individuals

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Name	Signature	Email	Date	Affiliation
Suzanna Graciano			5/10/17	resident
Mary Gustafson			5/10/17	resident
GERALD HOFFMAN			5/10/17	resident
JOAN HOFFMAN			5/10/17	resident
TOM GRACIANO			5/10/17	resident
David DeCelles			5/10/17	resident
MICHAEL L. ASTOR			5/10/17	"
Joseph R Klobberdanz			5/10/17	resident
Bryant Cobb			5/11/17	resident
PAUL RIBONICK			11/14/16	resident
Marta Casselman		mercasselman	5/11/17	Resident
Dan Casselman		ddcddc@me.com	5/11/17	Resident
KIM QUIGLEY			5/12/17	resident
VERONICA M. QUERIN			5/12/17	resident
Angela M Hagan			5-13-17	resident
Maureen Hagan			5/13/17	resident

I157-5
Cont.

Responses to Comments – Individuals

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Name	Signature	Email	Date	Affiliation
MaryAnn Cormier	MaryAnn Cormier		5-6-17	Resident
MARY CARMER	Mary Ann Cormier		5-6-17	Resident
Van Bruggen	Van Bruggen		5-6-17	Resident
Deanne V. Mitchell	Deanne V. Mitchell		5-6-17	Resident
Dr. Michael	Dr. Michael		5/6/17	Resident
Angelica S. Olivera	Angelica S. Olivera		5-6-17	Resident
Natasha Sullivan	Natasha Sullivan		5-6-17	Resident
Natasha Brown	Natasha Brown		5-6-17	Resident
VINCENT SULLIVAN	Vincent Sullivan		5-6-17	Resident
EMIL OLIVER	Emil Oliver		5/8/17	Resident
DOROTHY FOELLNER	Dorothy Foellner		5/8/17	Resident
ALICE BUSH	Alice Bush		5/8/17	Resident
TRAVIS SIMMONS	Travis Simmons		5/8/17	Resident
WAGNER KEMER	Wagner Kemer		5/8/17	RESIDENT
Marylou Arnold	Marylou Arnold		5/8/17	Resident

I157-5
Cont.

Responses to Comments – Individuals

SAVE AZTEC CANYON

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Name	Signature	Email	Date	Affiliation
Robert P. Hagen		Bob.Hagen@sdstate.edu	4-5-17	SDSU/Resident
William Bishop			5-1-17	
Sharon Ningsola			5-1-17	
Jeanne Meishon		jeanne.meishon@sdstate.edu	5/1/17	resident
Joyce Chuade			5/1/17	resident
Rafael Bartos			5/1/17	resident
Bob Gouvenek			5/1/17	resident
Michael Hagen			5/1/17	resident
Nancy Hagen			5/1/17	resident
Lizbeth Reid		lizbethreid@sdstate.edu	5/1/17	RESIDENT
LUANNE REID		" " " " " "	5/3/17	"
Sharon Erwin			5/5/17	Resident
Charlene Sicker			5/5/17	Resident
J. R. Hines			5/5/17	county resident
Dorothy L. Velasquez			5-5-17	resident

I157-5
Cont.

Responses to Comments – Individuals

PETITION TO GOV. BROWN – STOP SDSU FROM KILLING THE CANYON!
 SDSU proposes to destroy a pristine canyon with its endangered species and scenic vistas to build 14 story tall Las Vegas-style dorms that they could build on top a parking lot on the campus instead. Please don't let SDSU destroy the canyon! It's one of the last places on campus with trees and it's part of a natural ecosystem that supports greenhouse gas reduction and many plants and animals.

Also Available at <https://www.ipetitions.com/petition/save-sdsu-canyon>

	Name	Address	Email	Phone
1	TINDERA DISTEFANO	8 S. 92nd 7844 Camino HUGAN	TINDERA D@AOL.com	858-552-087
2	Dawn Bratta	650 Camino del Sur SD		619-297-3763
3	Larry Lewis	1431 Helen Pl Ln	LarryLewis@att.net	858-248-5796
4	Maureen Lewis		poway200@cox.net	858-748-3549
5	Martyn Miller	235 Quince St #103	mfmiller5235@aol.net	619-291-2556
6	Adriana Jaime	3950 Ohio St #206 San Diego CA 92104	ajaima.ca@yahoo.com	619-306-7112
7	Laurie Viera	8001 Montara Ave San Diego 92126	Lviera@sandnet.net	858-586-1469
8	Conal George	1190 Naranca El Cajon	strongcard@yahoo	715-0568
9	Mary Ravenis	6041 Ridgemoor San Diego CA	12 ravenis@cox.net	619-460-8207
10	Maureen Kejis	7632 Starling St San Diego CA 92120	maureen.kejis@cox.net	619-582-6300
11	Mary J. Nigro	5751 Mahan Co San Diego CA 92120	mary.janenigro@gmail.com	619-583-6389
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I157-5
Cont.

Responses to Comments – Individuals

PETITION TO GOV. BROWN – STOP SDSU FROM KILLING THE CANYON!
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Also Available at <https://www.ipetitions.com/petition/save-sdsu-canyon>

	Name	Address	Email	Phone
1	Rosemary Belinfante	615 ARCADIA PL #104	Rosemary.2102@ATT.net	619-549-1889
2	Bob Brillantini	415 ARCADIA PL #104		619-352-3723
3	Em S. Scott	13028 BAKER RD SAN DIEGO 92101	judsco2@gmail.com	858-649-6111
4	Mona Kim	500 W. HARBOR DR SAN DIEGO 92101		619-840-5565
5	Shirley Siewert	13563 E. SAGEHURST RD LA JOLLA CA 92036	shirleysiewert@yahoo.com	619-985-2771
6	Jeffrey J. Jank	P.O. Box 9515 10039 WALDGROVE RD 72131		858-759-9533
7	John Feinstein			(8)-693-0090
8	LINDA KENNEDY	6041 CIRRUS ST SD 92110		
9	ALMA MARLING	2270 DUNE ST		619-297-1593
10	Jolene Koubek	7572 Cullen St		
11	Sharon H. Henry	3608 Browning St		(619) 284-4034
12	E. Patricia Stehlik	4941 Ibis St #706 San Diego 92113		296-6605
13	Melanie Dunn	5429 Redland Drive		(619) 701-4515
14	SUSAN THOMPSON	812 TEMPLE ST	stthompson@gmail.com	(619) 223-7451
15	NORMAN RUCKER	7613 SEAGULL CT.	jeanierucker@gmail.com	858 560 5666
16	Linda Wilson	6460 Conway Ct #283 SB 92117	socalrules@hotmail.com	619 892 1116
17	Mary Jo Kichlight	325 Remington St #1256 Spring Valley, CA		619-434-9630
18	Ann Fradet	13718 SAGE MEADOW LN VALLEY CENT, CA 92082	Amfradet@aol.com	760-749-6036
19	PHYLLIS ROEDER	2834 GREYLINE DR SD 92123		858-277-1941
20				

1157-5
Cont.

Responses to Comments – Individuals

PETITION TO GOV. BROWN – STOP SDSU FROM KILLING THE CANYON!
 SDSU proposes to destroy a pristine canyon with its endangered species and scenic vistas to build 14 story tall Las Vegas-style dorms that they could build on top a parking lot on the campus instead. Please don't let SDSU destroy the canyon! It's one of the last places on campus with trees and it's part of a natural ecosystem that supports greenhouse gas reduction and many plants and animals.

Also Available at <https://www.ipetitions.com/petition/save-sdsu-canyon>

	Name	Address	Email	Phone
1	Saxon Rowlings	736 S. Green Hill Rd. #278 Visalia, CA 93221		
2	Ellis Rose	1501 Imperial Ave San Diego, CA 92101	ellis.l.rose@gmail.com	619-389-4907
3	Kerwin Anderson-Dorr	10853 S. Valde Ct San Diego, CA 92124	KSLND@juno.com	619 8926399
4	Patricia Baggett	3629 Flint St #3	phaggert@gmail.com	619-600-6706
5	Michael Severance	4172 Montano Dr.	mseverance@sandiego.net	619-425-0557
6	Wendy Michaelitz	693 Orchid Lane SD, 92014	funkyframes4u@gmail.com	619-822-4636
7	ROBERT MAGIAR	947 GREENFIELD DR 62 CAJON, CA 92021	COMPMATEK16@MAIL.COM	920 291 9880
8	Yvonne Creigh	3102 Monrovia Way Natick, MA 01907	yvonnecreigh@gmail.com	317 691 4960
9	Julie McMillin	4055 Crystal Downs Ln SD CA 92122	jcmcmill@gmail.com	917 589-5210
10	JANET FOX	1205 PACIFIC HWY SAN DIEGO, CA 92101	JANETFOX@CHSMAIL.COM	619 255-1551
11	KRISTINA PURTLE	7613 SENGUILL CT SD CA 92123	LAWLESS13@GMAIL.COM	306/819-3848
12	HEATHER PURTLE	7613 SENGUILL CT San Diego, CA 92123	BEACHMURDER@GMAIL.COM	206/819-3847
13	CARPENTER, CARLEY F.	5281 REMINGTON RD.	N/A.	583-1064
14	Team Lynn	30 CA 92115 3802 Loma Alta Dr	N/A	619-813-8711
15	Peter Lagio	1838 Edgemont St SD CA 92102	N/A	619-832-0603
16	Julie Thompson	4880 Bona S.D. CA 92114	—	619-280-9142
17	Jamie Brummund	65 Thompson Ln Coronado 92118	gusjimb@att.net	
18	Lisa Brummund	65 Thompson Ln Coronado, CA 92118	gusjimb@att.net	
19	H Claire Jackson	4437 Cleveland Ave San Diego, CA 92115	(619) 559-7430	
20				

1157-5
Cont.

Responses to Comments – Individuals

PETITION TO GOV. BROWN – STOP SDSU FROM KILLING THE CANYON!
 SDSU proposes to destroy a pristine canyon with its endangered species and scenic vistas to build 14 story tall Las Vegas-style dorms that they could build on top a parking lot on the campus instead. Please don't let SDSU destroy the canyon! It's one of the last places on campus with trees and it's part of a natural ecosystem that supports greenhouse gas reduction and many plants and animals.

Also Available at <https://www.ipetitions.com/petition/save-sdsu-canyon>

	Name	Address	Email	Phone
1	Betty Ball	3092104 2463 Dulzura	b.ball11@gmail.com	619-281-3531
2	Cam Condit	14723 Puma Trail Valley Center CA 92082		760 757 2875
3	Carol Telle	4106 Michael Dr La Mesa, 92044		
4	Pam Barratt	2961 Caminito Niqued	pbarratt@gbl.org	
5	Katting Radmorsta	677 G St #81 Chula Vista, 91910	NA	(619) 426 6538
6	Debra Koo Nle	7717 Lookout 92037		858-454-1381
7	Jerry Sutton	4020 Charles St La Mesa 91941		619 713 2335
8	Coni Scherke		ConSchmail@aol.com	
9	Carol B. Nelson	1601 Keeler St. San Diego, 92103		619-291-7853
10	Ruth Esoto	4027 C St San Diego CA 92102		
11	Elisa R. Penaloza	356 Northgate St.	eperaloza@sandi.net	(619) 347-9055
12	Gigi Carrillo	5552 Cambria Ct. SD, CA 92120	gcarrillo@sandinet.net	760-815-3025
13	Tracy Stuhler			(619) 733-0297
14				
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1157-5
Cont.

Responses to Comments – Individuals

Secure | <https://www.petitions.com/petition/save-sdsu-canyon>


ipetitions
FOUR YEARS AGO

Sign in or join

Save SDSU Canyon

455 signatures Goal: 1,000

The Petition 1 Highlight 159 Comments 455 Signatures



SDSU proposes to destroy a pristine canyon with its endangered species and scenic vistas to build 14 story tall Las Vegas-style dorms that they could build on top a parking lot on the campus instead. Please don't let SDSU destroy the canyon! It's one of the last places on campus with natural trees and it's part of a natural ecosystem that supports greenhouse gas reduction and many plants and animals.

SIGN THIS PETITION

Name*

Email*

Comments

☒ Show my name in the Petition Signatures list

☒ Add my e-mail to this Petition's e-mail list

SIGN PETITION

HIGHLIGHT

1157-5
Cont.

Response to Comment Letter I157

Mark Nelson

June 3, 2017

- I157-1** The e-mail comment refers to an attached letter and two attachments relating to a petition and is an introduction to comments that follow. No further response is required.
- I157-2** The comment refers to three attachments to the e-mail – (1) a screenshot of the petition page; (2) an electronic file labeled “DEIR Comments – Petitions against Aztec Canyon destruction”; and (3) an electronic file labeled “Hand Signed Petitioners Against SDSU Destruction of Aztec Canyon.” The comment is an introduction to comments that follow. No further response is required.
- I157-3** The comment refers to attached pages with petition signatures of those opposed to the proposed project. The comment expresses general opposition to the Project, and expresses the opinions of the commentator of signatories to the petition. The comment will be included in the record and made available to the decision makers prior to a decision on the project. However, as the comment does not raise any issue concerning the EIR, no further response to this comment can be provided.
- I157-4** The comment is a screenshot of the petition page entitled “Save SDSU Canyon.” The page states that SDSU “proposes to destroy a pristine canyon” and build “14-story tall Las Vegas-style dorms that they could build on top a parking lot on the campus instead.” In response, the proposed project has been modified in response to public comment submitted on the Draft EIR and no longer includes Phases II and III, which are the “14 story tall Las Vegas-style dorms” referenced on the website. Furthermore, the proposed project now consists only of Phase I, which would be constructed on the referenced parking lot. With respect to the comment regarding the “destruction of a pristine canyon,” 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, the elimination of Phases II and III ensures no direct impacts to biological resources in the canyon.
- I157-5** The comment is a petition page including the referenced signatures. The comment is acknowledged and will be included as part of the record made available to the decision makers prior to a decision on the proposed project. However, as the comment does not raise any issue concerning the EIR, no further response to this comment can be provided.

INTENTIONALLY LEFT BLANK

Comment Letter I158



Laura Shinn <lshinn@mail.sdsu.edu>

DEIR Comments - Phases II and III of the SDSU West Campus Residential Housing Piecemealing

1 message

Mark Nelson (Home Gmail) <menelson@gmail.com>

Sat, Jun 3, 2017 at 10:38 AM

To: Laura Shinn <lshinn@mail.sdsu.edu>

Cc: twhite@calstate.edu, Trustee Secretariat <TrusteeSecretariat@calstate.edu>, mcollins@mail.sdsu.edu, presidents.office@sdsu.edu, President's Office <presoff@mail.sdsu.edu>

Attached are my partial comments to the 4-21-17 DEIR by SDSU for the West Campus residence hall project regarding CEQA piecemealing. Because Phases II and Phases III were reasonably foreseeable by SDSU in 2010, all environmental documents after 2010 have misrepresented SDSU's environmental impacts. Phase II and Phase III are piecemealing and must be denied.

These comments are 3 files, a discussion document and two attachments. These comments are only complete with all 3 documents and the transmittal email.

INSTRUCTIONS TO THE TRUSTEE SECRETARIAT - Please distribute to all Trustees and Alternates

3 attachments

2010_sdsu-west-campus-housing-masterplan_landlab-website.pdf
935K

2010_sdsu-west-campus-housing-masterplan_landlab_google search.pdf
114K

Mark Nelson CEQA Piecemealing DEIR Comments 6-3-17.pdf
97K

I158-1

I158-2

I158-3

Responses to Comments – Individuals

This is Google's cache of <http://land-lab.com/project/sdsu-west-campus-housing-masterplan/>. It is a snapshot of the page as it appeared on May 4, 2017 16:08:03 GMT. The current page could have changed in the meantime. [Learn more](#)

[Full version](#) [Text-only version](#) [View source](#) Tip: To quickly find your search term on this page, press **Ctrl+F** or **⌘-F** (Mac) and use the find bar.

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 - [Our Commitment to the Environment](#)
 - [Design Process](#)
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I158-4

SDSU West Campus Housing Masterplan

The Facts

Location: San Diego, CA, USA
Size: 16 Acres
Partners: Carrier Johnson Architects
Client: San Diego State University
Budget: N/A
Completed: 2010

About the Project

landLAB collaborated with Carrier 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 patios, terraces and roof deck are oriented to capture views of mountains beyond. Bougainvillea covered arcades direct the user into the main entry points and public dining areas. Series of courtyards pique your interest, and create a variety of spaces for both the public and for residents. A gated pool and large fire pit activate 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, lies grand staircase that provides a direct route from the main dining terrace down to the Canyon Trails (and access road). Along this same access road, small cafe is conveniently located, to grab a quick latte on your way to class, or a sunny place to hang out and meet up with friends.

- 1.
- 2.
- 3.

I158-4
Cont.

Responses to Comments – Individuals



Housing Masterplan

I158-4
Cont.

Site Section A

I158-4
Cont.

Site Section B

1158-4
Cont.

Site Analysis

I158-4
Cont.

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San Diego

702 Wreton Dr.
San Diego,
CA 92109
info@land-lab.com
858.483.9817

Redondo Beach

2620 Curtis Ave.
Unit B
Redondo Beach,
CA 90278
info@land-lab.com
310.793.2971

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landLAB environmental design

I158-4
Cont.

Responses to Comments – Individuals

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Looking for Something?



I158-4
Cont.



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SDSU West Campus Housing Masterplan

The Facts

Location: San Diego, CA, USA

Size: 16 Acres

Partners: Carrier Johnson Architects

Client: San Diego State University

Budget: N/A

Completed: 2010

I158-4
Cont.

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I158-4
Cont.



I158-4
Cont.

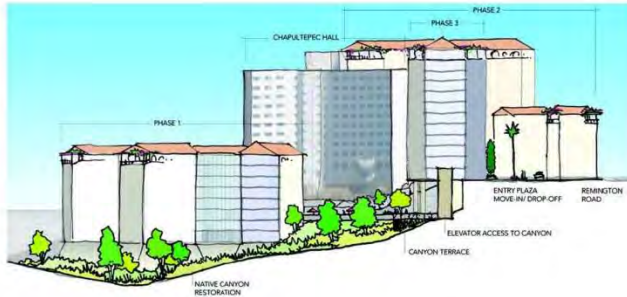
Housing Masterplan



Site Section A

1158-4
Cont.

Responses to Comments – Individuals



Site Section B



I158-4
Cont.

Site Analysis



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San Diego Redondo Beach Follow Us

702 Wreton Dr. 2620 Curtis Ave.
San Diego, Unit B
CA 92109 Redondo Beach,
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310.793.2971



landLAB environmental design Looking for Something?

I158-4
Cont.

Responses to Comments – Individuals

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Find...

Responses to Comments – Individuals

Mark Nelson
5417 Hewlett Drive
San Diego, CA 92115
menelson@gmail.com

June 3, 2017

Laura Shinn
San Diego State University
LShinn@mail.sdsu.edu

SUBJECT: Phases II and III of the SDSU West Campus Residential Housing Piecemealing

The attached evidence demonstrates that SDSU had a reasonable expectation of Phase II and Phase III as early as 2010. As a result, each and every environmental document after 2010 required disclosure of Phase II and Phase III as a cumulative impact. During that time, certified EIRs and other environmental documents misrepresented SDSU's reasonably foreseeable project and the EIRs were incomplete. Because Phase II and Phase III are the fruit of piecemealing, they should be precluded from development.

Sincerely,

Mark Nelson

Attachments: LandLab 2010 West Campus Design
Google.com search results for LandLab 2010 West Campus Design

1158-5

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Response to Comment Letter I158

Mark Nelson

June 3, 2017

I158-1 The comment states that because Phases II and III were reasonably foreseeable in 2010, all environmental documents after 2010 misrepresented the environmental impact, and that Phases II and III are piecemealing. Preliminarily, the reference to year 2010 is in error; 2013 is the correct year. 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. In any event, the referenced 2013 Carrier Johnson study was a feasibility study only; Phases II and III were not “reasonably foreseeable” during this time period.

Additionally, in response to public comments, the proposed project has been modified and no longer includes Phases II and III. As a result, 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. (Please see Final EIR, Preface, for additional information regarding the project modifications.) Therefore, any environmental documents prepared during this time period that would have included Phases II and III would have overstated impacts. As to the comment regarding piecemealing, please see the responses to comments I166 and I167 for information responsive to this comment..

I158-2 The comment refers to the attachments to the e-mail and is an introduction to comments that follow. No further response is required.

I158-3 The comment further refers to the e-mail attachments and is an introduction to comments that follow. No further response is required.

I158-4 The comment is a snapshot of the LandLab website and related reference to the year 2010. However, the date is incorrect and has since been corrected. Please see response to comment I158-1 for information responsive to this comment.

I158-5 The comment generally repeats the statements contained in comment I158-1. Please see the response to comment I158-1 for information responsive to this comment.

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Responses to Comments – Individuals

Comment Letter I159

Jamie Carr

From: Sarah Lozano <slozano@dudek.com>
Sent: Monday, May 01, 2017 1:36 PM
To: Michael Haberkorn; Aarti Kewalramani
Cc: Katie Laybourn; Anita Hayworth; Callie Ford; Michael Huff
Subject: FW: 5417 Hewlett Dr 92115 - Fire Clearance Thinning

Michael/Aarti - FYI.

Mike Huff, Anita, Callie, Katie, keeping you cced on this. No action necessary on your part. Call me if you want more background.

Thanks,
Sarah

From: Forburger, Kristen [<mailto:KForburger@sanidiego.gov>]
Sent: Monday, May 1, 2017 11:39 AM
To: menelson@gmail.com
Cc: Smit-Kicklighter, Holly <HSmit@sanidiego.gov>; Sarah Lozano <slozano@dudek.com>; Laura Shinn <lshinn@mail.sdsu.edu>
Subject: RE: 5417 Hewlett Dr 92115 - Fire Clearance Thinning

Hello Mr. Nelson,

The City's MSCP section of the Planning Department does not provide permitting authority; rather, any development or "vegetative clearing" proposal shall be submitted to the City's Development Services Department. Below is a link to the City's website that outlines Fire/brush hazards and DSD project submittal requirements.

<https://www.sandiego.gov/fire/services/brush>

<https://www.sandiego.gov/development-services/devprocess>

I have included SDSU and their consultant on this email and will forward your subsequent email.

Thank you,

Kristy Forburger
Senior Planner
City of San Diego
Planning Department/Multiple Species Conservation Program (MSCP)
T (619) 236-6583
www.sandiego.gov

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From: Mark Nelson (Home Gmail) [<mailto:menelson@gmail.com>]
Sent: Monday, May 01, 2017 12:28 AM

I159-1

Responses to Comments – Individuals

To: Smit-Kicklighter, Holly <HSmit@sanidiego.gov>
Cc: Mark Nelson (SCE) <mark.nelson@sce.com>
Subject: 5417 Hewlett Dr 92115 - Fire Clearance Thinning

As I am sure that you are well aware, SDSU plans to put 11 and 14 story dorms in the canyon to the west of SDSU in a CalFire Very High Fire Hazard zone. As a result, SDSU will be conducting both wholesale clearance of land via massive grading to be followed by significant thinning. The SDSU supplied drawings below show the significant removal of canyon and the final slide shows the additional land that will be thinned or completed covered with concrete or structures.

I 159-2

As I am also sure that you are aware, CalFire has pronounced that 95% of all fires in these hazard areas are man made. Furthermore, USGS has pronounced that increased human population in hazard areas will lead to increased fires. This was specifically in response to San Diego county fires.

I 159-3

As a result, I am requesting authority to move in unison with SDSU (i.e., the State of California authority and approval via the Legislature's CEQA delegated authority to the CSU Trustees) in both clearing and thinning the canyon behind my property at 5417 Hewlett.

I 159-4

In order to protect my safety, I plan to thin equidistant to SDSU's thinning from our common lot line toward my home, and then completely remove all brush and vegetation to form a fireblock behind my home.

I 159-5

While it is truly unfortunate, the delegated CEQA authority of the legislature to the CSU Trustees will create a fire hazard of mammoth scale with 1700 students in the canyon. I cannot allow that fire hazard to place my life or property at risk.

I 159-6

Please provide me with the appropriate forms for approval.

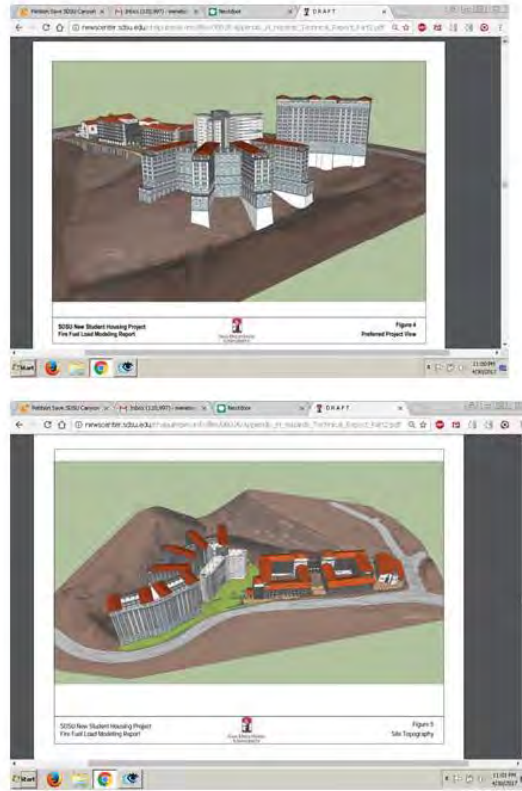
I 159-7

Mark Nelson
OWNER
5417 Hewlett Drive

----- Forwarded message -----

From: **Mark Nelson (Home Gmail)** <menelson@gmail.com>
Date: Sun, Apr 30, 2017 at 11:03 PM
Subject: Hazard
To: "Mark Nelson (Gmail)" <menelson@gmail.com>

Responses to Comments – Individuals



I159-8

Responses to Comments – Individuals



I159-8
Cont.

Response to Comment Letter I159

Mark Nelson

May 1, 2017

I159-1 The “comment” is an e-mail from the City of San Diego in response to an e-mail from one of the Draft EIR commentators regarding the City approval process necessary to conduct “vegetative clearing.” While the comments were not submitted to SDSU as part of the public review process associated with the Draft EIR and, therefore, no responses are required, responses to the comments are provided for information purposes.

Specific to Comment I159-1, the comment serves as an introduction to the Draft EIR commentator’s e-mail. The comment will be included as part of the record and made available to the decision makers before a final decision on the Project.

I159-2 The first comment from the Draft EIR commentator to the City of San Diego refers to the clearance of land via grading to be followed by thinning that would be conducted in connection with development of the proposed project in the vicinity of the canyon. The comment restates information contained in the 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. However, it is noted that in response to public comments, the proposed project has been modified and no longer includes Phases II or III; the proposed project now consists only of Phase I, which would be developed on existing parking Lot U, and there would be no development in the canyon. Therefore, the basis for the comment is no longer applicable.

I159-3 The comment states that most fires in these areas are man-made, and that increased population will lead to increased fires. The EIR addresses the hazards associated with wildland fires in EIR Section 4.8. As the comment does not raise an issue regarding the analysis, no more specific response can be provided. 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.

I159-4 The comment requests authorization from the City to clear and thin the canyon behind his property. The comment is unrelated to the Draft EIR and, therefore, no response 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.

I159-5 The comment describes the proposed thinning. The comment is unrelated to the Draft EIR and, therefore, no response 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

- I159-6** The comment states the proposed project would create a fire hazard of mammoth scale. As previously noted, the EIR addresses the hazards associated with wildland fires in EIR Section 4.8. As the comment does not raise an issue regarding the analysis, no more specific response can be provided. 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.
- I159-7** The comment requests the appropriate forms from the city. No further response can be provided.
- I159-8** The comment consists of various screenshots relating to the project as originally proposed, including three phases of development. However, as explained in the response to comment I159-2, the proposed project has been modified to eliminate Phases II and III and now consists of only Phase I.

Responses to Comments – Individuals

Comment Letter I160

Jamie Carr

From: Sarah Lozano <slozano@dudek.com>
Sent: Thursday, May 04, 2017 1:50 PM
To: Michael Haberkorn; Aarti Kewalramani; Maddy M. Kilkenny
Cc: Katie Laybourn
Subject: FW: Follow up information on fire hazard created by SDSU behind 5417 Hewlett Dr

Michael, Aarti, Maddy,

Here is the second email from Nelson to City staff. City staff are inferring that they believe this should be included as a formal comment letter on the DEIR. We can discuss on Monday.

Thanks,
Sarah

From: Forburger, Kristen [<mailto:KForburger@sanidiego.gov>]
Sent: Monday, May 1, 2017 11:42 AM
To: Sarah Lozano <slozano@dudek.com>; Laura Shinn <shinn@mail.sdsu.edu>
Cc: Smit-Kicklighter, Holly <HSmit@sanidiego.gov>; menelson@gmail.com
Subject: RE: Follow up information on fire hazard created by SDSU behind 5417 Hewlett Dr

Sarah and Laura,

Please see the previous email and the information contained herein and consider for response to comments to the DEIR for SDSU Student Housing Project.

Thank you,

Kristy Forburger
Senior Planner
City of San Diego
Planning Department/Multiple Species Conservation Program (MSCP)
T (619) 236-6583
www.sanidiego.gov

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From: Smit-Kicklighter, Holly
Sent: Monday, May 01, 2017 11:16 AM
To: Forburger, Kristen <KForburger@sanidiego.gov>
Subject: FW: Follow up information on fire hazard created by SDSU behind 5417 Hewlett Dr

From: Mark Nelson (Home Gmail) [<mailto:menelson@gmail.com>]
Sent: Monday, May 01, 2017 12:33 AM

I160-6

Responses to Comments – Individuals

To: Smit-Kicklighter, Holly <HSmit@sanidiego.gov>; Mark Nelson (SCE) <mark.nelson@sce.com>
Subject: Follow up information on fire hazard created by SDSU behind 5417 Hewlett Dr

CALFIRE's assessment rates the canyon as VERY HIGH FIRE HAZARD SEVERITY (Designation courtesy of CAL FIRE's Fire and Resource Assessment Program (FRAP).) (<http://www.readysandiego.org/wildfire-hazard-map/>)

I 1160-2

From a plain reading of the project plan, SDSU plans to have windows that open, decks, and general access to the canyon with tables and umbrellas. As a result, SDSU will increase the human interaction with the canyon (VERY HIGH FIRE HAZARD rating) and increase the risks both to students and the general, surrounding public.

I 1160-3

In a recent article about wildfires in San Diego, the United States Geological Survey stated that "The probability of fires is increasing because people are increasing," said the U.S. Geological Survey's Jon Keeley, who has spent years studying the history of California wildfires.

I 1160-4

Furthermore, CalFire blames people as the overwhelming majority cause, and SDSU is injecting students into the canyon 24/7/365 in large numbers. The article continues that "unlike remote parts of the world where natural events like lightning strikes are prime sources of wildfires, in southern California, such fires are almost always started by people. Ninety-five percent have a human cause, according to Cal Fire, the state's firefighting agency." (<http://news.nationalgeographic.com/news/2014/05/140517-san-marcos-wildfires-california-weather/>)

I 1160-5

There is no question that SDSU is planning for fire due to both the natural surrounding and the increased risk of fire from construction and 1,700 residents. As a result, homeowners must take equal countermeasures.

I 1160-6

As stated in my other email, please provide me with forms for fire clearance approval ASAP.

I 1160-7

Response to Comment Letter I160

Mark Nelson

May 1, 2017

I160-1 The “comment” is an e-mail from the City of San Diego in response to an e-mail from one of the Draft EIR commentators regarding the City approval process necessary to conduct “vegetative clearing.” While the comments were not submitted to SDSU as part of the public review process associated with the Draft EIR and, therefore, no responses are required, responses to the comments are provided for information purposes.

Specific to Comment I160-1, the comment serves as an introduction to the Draft EIR commentator’s e-mail. The comment will be included as part of the record and made available to the decision makers before a final decision on the Project.

I160-2 The first comment refers to CalFire assessment of the canyon. The EIR addresses the hazards associated with wildland fires in EIR Section 4.8. As identified in the EIR’s 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. However, 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 the comment does not raise an issue regarding the EIR analysis, no more specific response can be provided. 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.

I160-3 The comment states that the proposed project will increase the human interaction with the canyon and increase the risk of fire. Preliminarily, it is noted that in response to public comments, the proposed project has been modified and no longer includes Phases II or III; the proposed project now consists only of Phase I, which would be developed on existing parking Lot U, and, as a result, there would be no development in the canyon. Additionally, the EIR addresses the hazards associated with wildland fires in EIR Section 4.8. As the comment does not raise an issue regarding the EIR analysis, no more specific response can be provided. 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

- I160-4** The comment cites a recent article stating that the probability of fires increases because people are increasing. As previously noted, the EIR addresses the hazards associated with wildland fires in EIR Section 4.8. As the comment does not raise an issue regarding the EIR analysis, no more specific response can be provided. 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.
- I160-5** The comment states people are the majority cause of fires and SDSU is adding students to the canyon in large numbers. However, as previously noted, the proposed project has been modified to eliminate development in the canyon, as well as reduce the number of student housing beds from approximately 2,600 to 850. Moreover, the EIR addresses the hazards associated with wildland fires in Section 4.8. As the comment does not raise an issue regarding the EIR analysis, no more specific response can be provided. 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.
- I160-6** The comment states SDSU is planning for increased fire risk and homeowners must take equal countermeasures. The comment is referring to the commentator's request to the City to authorize brush removal. (See response to comment I159-1.) As the comment does not address the EIR, no further response is provided.
- I160-7** The comment requests the appropriate forms from the city for brush clearance authorization. No further response can be provided.

Responses to Comments – Individuals

Comment Letter I161

From: Mark Nelson <Mark.Nelson@sce.com>
Date: Sat, Apr 22, 2017 at 11:33 PM
Subject: Request for extended review period.
To: "Jshinn@mail.sdsu.edu" <Jshinn@mail.sdsu.edu>

Consistent with Guidelines [§15105](#), review periods for draft EIRs should not be less than 30 days nor longer than 60 days from the date of the notice except in unusual situations. This is an unusual situation and this is a formal request for an extension to 120 days. This extension is based on the misrepresentation by SDSU, as posted on their website, that the DEIR would be released "late spring/early summer". As a result of misleading the public on the dates, the public does not have adequate preparation time for marshalling resources for review and comment.

This request will also be brought to the State Clearinghouse under separate request.

Mark Nelson | Director | Planning, Analysis & Forecasting | SIPP | Southern California Edison
Office: [626-302-2305](tel:626-302-2305) | Fax: [626-302-5210](tel:626-302-5210)

Be Safe. Always.

(My Evening/Weekend Messages Can Wait to Next Business Day)

I161-1
I161-2

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Response to Comment Letter I161

Mark Nelson

April 22, 2017

- I161-1** The comment requests additional time to submit comments on the Draft EIR based on a SDSU website posting stating that the Draft EIR would be released for public review during the “late spring/early summer.” The Draft EIR was released for public review during the spring, on April 21, 2017, generally within the posted timeframe. There is no requirement under CEQA that advance notice of release of a Draft EIR be provided and the website information was provided as a courtesy, to provide the community with the general timeframe for Draft EIR release. The Draft EIR public review period complied with CEQA’s requirements. Pursuant to CEQA Guidelines Section 21091, the Draft EIR was circulated for a 45-day public review period beginning April 21, 2017 and ending June 5, 2017.
- I161-2** The comment states that the request will also be brought to the State Clearinghouse. The comment is noted.

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Responses to Comments – Individuals

Comment Letter I162

From: Vicky Kortlang <johnnvivicky@icloud.com>
Date: Tue, May 9, 2017 at 5:07 PM
Subject: Deceitful Reports with regard to Phase 2 and Phase 3 Proposal for Student Housing
To: ishinn@mail.sdsu.edu

My name is Victoria Kortlang. I have lived at my home at 5357 Redding Rd continuously for 42 years. My family has owned the property 55 years, in which I spent my later childhood years.

I 162-1

I am disgusted with the proposal to put a City style complex of high rise buildings, some butting up against mostly single story homes , and in our canyons lands. The lies and cheats which have been fed to us for the last 6 months, and way more when one considers that you have been in planning since 2010, without ever making us aware astounds me. Of course, through attending the last three meetings I have found that there is a lack of integrity and honesty, and downright cheating with regard to environmental issues. Below are my comments on several issues.

I 162-2

First, You have said that there is little environmental impact using the canyon land from your EIR, yet the gnatcatcher is known to be in the adjoining canyons. Other wildlife will also be impacted. I believe your EIR is swayed, either by money, or some other force.

I 162-3

Second, I am certain that adding all of these beds, buildings, cars (which you state would be used by 32%, but has shown through current research to be by more than 50% of students), and removing parking will greatly hinder transportation both in and out of College View Estates. We have a two lane street in and out of our community. Along with, already significant school traffic, and neighborhood traffic, offering 6 drop off pick up spots will hardly make a helpful impact to an additional 2,000 students moving in and out each semester.

I 162-4

Also, with regard to traffic, how are residents going to manage their daily lives driving from here to there for work, jobs, appointments with construction going on all day long? And with regard to the same, you put up a map of streets in CVE and did not even show College Gardens Court which leads to our only other outlet, a narrow, curvy, hilly street that leads up to Alvarado Estates, and the only outlet for that community.

I 162-5

Another issue regarding traffic has to do with both, emergency services entering and leaving our neighborhood, and evacuation in case of fires or other disasters. Now we are talking about 340 plus residences, and another 2,700 hundred students, supposedly without cars. How is SDSU going to ensure safe evacuations of all people their Mega Dorms will affect.

I 162-6

Third, you stated that it has been found that there will be significant impact leaving SDSU via 55th to Montezuma in both directions. Additionally, a message was put up from SDSU President Dr. Hirshman, which stated due to these significant impacts, mitigation would need to occur. When I asked the question, knowing Hirshman is resigning, what happens when Hirshman leaves? Regarding this message, I got a shrug as response. What kind of answer is that to a real concern? This shows a complete lack of any care to what we think and what we deserve, which is responsible, honest responses to our

I 162-7

I 162-8

Responses to Comments – Individuals

questions.

Additionally, I too am an alumni of SDSU, as is my mother, and my brother. I received my bachelor, two teaching credentials and my Masters there. I am extremely disturbed at the lack of care the disruption of your plan will have on our quality of life, as well as the way you treat this community as if we are just patsies over which you can run. This community Will Fight for that quality of life!

I would like a response to my comments.

Victoria Kortlang
5357 Redding Rd.
San Diego, CA 92115
619-964-2760

Sent from my iPad

↑ I162-8
Cont.
I162-9

Response to Comment Letter I162

Vicky Kortlang

May 9, 2017

- I162-1** The comment is an introduction to comments that follow. No further response is required.
- I162-2** 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.
- I162-3** The comment regards impacts to the canyon land around the project site and the presence of gnatcatchers in adjoining canyons. Please see Biological Resources Thematic Response. 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.
- I162-4** The comment regards the EIR parking analysis and states that the removal of parking will greatly hinder the community. The EIR Transportation/Circulation and Parking section, Section 4.14, addressed the project's potential impacts relative to parking, including in the College View Estates area, and determined that there is adequate parking available on campus, as well as appropriate features in place, such that parking related impacts would be less than significant. As to the comment regarding the percentage of students that take cars to campus, as explained in the response to comment O6-169, the latest available data shows that 19.9% of SDSU students living in dorms purchased an overnight parking permit in 2016. Therefore, the EIR's use of 32% represents a reasonable estimate of the number of new resident students that would bring a vehicle to campus and actually overstates the parking demand associated with the Project relative to the most recent numbers.

Regarding the existing condition on Remington Road, the proposed project includes a designated area outside of the flow of traffic to accommodate pick-ups/drop-offs. Additionally, the proposed project also includes an area to accommodate move-ins/move-outs that is removed from Remington Road, to be located on the north side of the new building. See Final EIR Project Description, Figure 2-11. Therefore, the comment that the pick-up/drop-off area will accommodate move-ins/move-outs as well, is incorrect – there will be a separate area for move-ins/move-outs in addition to the pick-up/drop-off zone. Lastly, in response to public comments received on the Draft EIR, the proposed project has been modified to eliminate Phases II and III and will only include Phase I. Therefore, the comment regarding an additional 2,000

Responses to Comments – Individuals

students is no longer correct. Please see Final EIR, Preface, for additional information regarding the project modifications.

Beyond that, the comment addresses general subject areas, which received extensive analysis in the EIR Section 4.14, Transportation/Circulation and Parking. 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.

- I162-5** The comment asserts that construction “will be going on all day” and asks how residents will be affected. The EIR includes a mitigation measure, MM-TRA-5, which provides that prior to the commencement of construction activities, SDSU is to prepare and implement a Traffic Control Plan, consistent with City of San Diego and Caltrans standards, that will provide for the safe and effective movement of vehicles, pedestrians, and bicyclists through or around temporary traffic control zones. With implementation of the TCP, any impacts related to construction activities would be less than significant.

The comment also asks about College Gardens and the analysis of traffic through that area. The EIR traffic engineer determined, based on a travel demand model prepared by SANDAG, that only approximately 2% of Project traffic would travel west on Remington Road into the College View Estates and College Gardens neighborhoods, with 98% of Project generated traffic driving east on Remington Road or Canyon Crest Drive. Therefore, the Project would not generate a sufficient number of vehicle trips through the area requiring further analysis. For additional information responsive to this comment, please also see the responses to comments O-6-29 through O-6-32.

- I162-6** The comment addresses general subject areas, which received extensive analysis in the EIR. The Project’s impacts relative to emergency services access 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.

- I162-7** The comment addresses general subject areas, which received extensive analysis in the EIR. The Project’s impacts relative to the 55th Street/Montezuma intersection and traffic along Montezuma 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.

- I162-8** 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

Responses to Comments – Individuals

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

I162-9 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 EIR. For that reason, no further response to this comment is provided.

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Responses to Comments – Individuals

Comment Letter I163



Laura Shinn <lshinn@mail.sdsu.edu>

Formal Comments for SDSU Dorm DEIR (4-21-17)

1 message

Laurie Katz <lauriekatz280@gmail.com>

Sat, Jun 3, 2017 at 9:56 AM

To: LShinn@mail.sdsu.edu

Cc: TWhite@calstate.edu, TrusteeSecretariat@calstate.edu, Presidents.Office@sdsu.edu, PresOffi@mail.sdsu.edu, mcollins@mail.sdsu.edu, Jeff Katz <jeff@jeffkatzarchitecture.com>

Please find attached my comments on the DEIR for the dorm project.

Laurie Katz

I 163-1



Letter of Opposition to SDSU MEGADORM - LK.pdf
129K

Responses to Comments – Individuals

Laurie Katz
5483 Drover Drive
San Diego, CA 92115
Lauriekatz280@gmail.com

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

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

Thank you for the opportunity to respond to SDSU's plans to build a new dorm complex on Remington Road. I have been a resident of College View Estates (CVE) for four years. As a resident of CVE, 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 are not reasonable or satisfactory to me as a resident of the community.

I163-2

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.

I163-3

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:

I163-4

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

I163-5

Responses to Comments – Individuals

2600 bed, \$0.5 BILLION project it should have built in time for environmentally responsible site selection.

↑ I163-5
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.
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. Alternative Site options that maintain the stated goals of "a distinct west campus housing neighborhood similar to ... the east side of campus" and Objective 2 requires "alleviate isolation of Chapultepec". There are multiple alternative site options that can support the construction of Phase 2 and 3, without building in the undeveloped canyon, including the area of the current International Student Center, the new Soccer field, or even the existing low rise apartments on 55th Street. All of these options will allow the construction of Phase 2/3 of the project, with minimal impact on existing operations, minimal cost for demolition and relocation and no disturbance to undeveloped canyon areas. Further analysis of alternative sites must be considered even if they are currently developed.
5. 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.
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.

I163-6

I163-7

I163-8

I163-9

I163-10

2

Responses to Comments – Individuals

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.

I163-10
Cont.

7. 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.

I163-11

8. 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. Quoting from the SDSU Facility website regarding sustainability, *Campus sustainability encompasses a wide variety of efforts to steward the University's resources and reduce our environmental impact. Sustainability includes areas such as climate action, energy, water, waste reduction, transportation, food, green buildings, social responsibility, and academics. Efforts span from large capital projects to outreach efforts, engaging the campus to embrace and embody sustainability. Campus sustainability partners with all other areas of Facilities Services and entities across campus, including auxiliaries and academics.* In keeping with the University's expressed goal of sustainable development, the construction of the new housing in areas of the campus previously developed should clearly be the preferred alternative to constructing in the undeveloped canyon. 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.

I163-12

9. 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

I163-13

Responses to Comments – Individuals

2050. It is insufficient and biased for SDSU to use a building and construction standard of “unusual” levels of energy consumption.

↑ I163-13
Cont.

10. 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.

I163-14

11. 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.

I163-15

12. SDSU must mitigate traffic impacts even in the event Phase 1 only moves forward. Given the current traffic drop off and delivery nightmare that exists on Remington Road with only the existing Chapultepec dorm, the addition of even a minimum Phase 1 will create unreasonable hazards on Remington Road – a City owned and not university owned street. Without proper drop off and delivery area the current situation of blocking bike lanes, parking on the sidewalk, and blocking travel lanes will only be exacerbated. The current proposed turn out lane can only accommodate 6-8 cars. On any given day today there are 6-8 cars pulled up alongside the existing dorms. Adding 850+ beds will certainly create more vehicle traffic in the area with deliveries, Uber/Lyft, personal vehicles, etc. Any final design for this project, even if only for Phase 1 must include significant off-road improvements to accommodate the reality of vehicle traffic serving these additional beds without adding to the congestion that exists today on Remington Road.

I163-16

13. SDSU must analyze the cost impacts of their proposed solutions and look for more cost effective alternatives. While detailed cost estimates are not a part of the DEIR, it would seem the cost of constructing in the canyon, including retaining walls, grading, shoring, deepened foundation systems, utilities and storm water treatment, would far exceed the cost of constructing on previously developed sites, even when including the cost of demolition, and/or relocation. A thorough alternatives analysis would need to include a detailed cost evaluation of the proposed and alternative sites as well.

I163-17

14. Geologic Impacts and mitigation measures need to be further analyzed to understand the project impacts. Mitigation measures MM-GEO-1 and -2 require further analysis be done prior to development. The potential impacts of the results of this further analysis must be taken into

↓ I163-18

Responses to Comments – Individuals

consideration as part of the CEQA process. For example, the note to remove and replace fill soils could require the removal of “9-40 feet of fill” in the area of the existing parking lot and up to 30 feet elsewhere adjacent to the canyon. The cumulative impacts of the removal and replacement of this material has not be analyzed with respect to construction noise or air quality or cost impact to the project. Further, basing project requirements on a nearly 30 year old (Woodward-Clyde 1988) report is unsatisfactory for a project of this magnitude. Given the changes in structural design requirements in the last 30 years, and a cursory updated report which includes only minimal additional borings, and the potential impact to the project necessitates a project specific geotechnical investigation be done prior to completion of the EIR in order to verify that the proposed mitigation measures don’t create other non-mitigable impacts.

I163-18
Cont.

15. SDSU must address the Aesthetic impacts of the proposed project. By its own review, the impact of Phases 2 and 3 of the project will have “Potential Impacts” to the scale and character of the canyon and surrounding single family residences. The use of the word “potential impact” is absurd, given the visual simulations provided within the report which clearly show the new structures dwarfing the existing neighborhood. Given the size of the development, the report rightly concludes that trees or other measures to reduce the visual impact would not be effective and the only potential mitigation is to redesign Phase 2 and 3. This redesign must be considered. As an aside, the comment that the buildings “*As shown in the architectural renderings, the new structures would be architecturally consistent with the Spanish Colonial and Mission Revival styles of the original SDSU campus buildings*” is an affront to architects and architectural historians everywhere. The proposed buildings are “Las Vegas Modern” at best and have no relationship to the beautiful traditional architecture, either in scale or detail, of the early campus buildings referenced.

I163-19

Sincerely,

Laurie Katz

CC: TWhite@Calstate.edu, TrusteeSecretariat@CalState.edu, Presidents.Office@sdsu.edu,
PresOffi@mail.sdsu.edu, mcollins@mail.sdsu.edu

Response to Comment Letter I163

Laurie Katz

June 3, 2017

- I163-1** The comment is an introduction to comments that follow. No further response is required.
- I163-2** 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 EIR. For that reason, no further response to this comment is provided.
- I163-3** The comment that the EIR is “insufficient” and that there are “feasible alternatives” addresses general subject areas, which received extensive analysis in the EIR. 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.
- I163-4** The comment is an introduction to comments that follow. No further response is required.
- I163-5** 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.
- I163-6** 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

Responses to Comments – Individuals

as part of the record and made available to the decision makers prior to a final decision on the Project.

- I163-7** 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.
- I163-8** Information regarding the alternatives is provided in the Alternatives Thematic Response.
- I163-9** 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.
- I163-10** 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 Phases II and III. Please see Final EIR, Preface, for additional information regarding the project modifications. With respect to information regarding the alternative of developing 1,400 beds on Lot U (Phase I), responsive information is provided in the Alternatives Thematic Response.
- I163-11** 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.
- I163-12** 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 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 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.
- I163-13** 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 EIR, the energy use expected from project construction and operation do not pose a significant increase from historical local use. Also, the use 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 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.

- I163-14** 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 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

Responses to Comments – Individuals

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. 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 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

Responses to Comments – Individuals

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 Phase II and Phase III.

I163-15 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. Because the proposed Project no longer includes Phase III, there will be no significant and unavoidable traffic impacts. 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.

I163-16 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.

I163-17 The comment states that SDSU must analyze the cost impacts of the alternatives. Please see the Alternatives Thematic Response for information responsive to the comment.

I163-18 As indicated on page 4.6-18, the EIR states that the project site is geotechnically suitable for the proposed development; however, substantial remedial grading and/or deep foundations would be needed to develop the site to provide long-term performance of the new buildings and associated exterior surface improvements. This text is based on Appendix A (2013 URS Geotechnical Report) of Appendix G – Geotechnical Resources Technical Report, which indicates that "substantial remedial grading" would be required in association with the project. However, the URS report does not quantify the amount of excavations/grading required. As indicated in the

URS report, the majority of the existing fill is undocumented and therefore may need to be removed, depending on which type of foundations are chosen. The fill could either be excavated and recompacted, or alternatively, deep pile foundations could be placed through the undocumented fill. Section 3.4.1 of the URS geotechnical report describes fill underlying the western parking lot up to 15 feet and up to 30 feet underlying the eastern parking lot. Such a depth of fill represents a substantial amount of fill. In addition, existing steep fill slopes do not meet current site development and grading codes. Therefore, these slopes may require additional work, potentially involving substantial earth work activities. Combined, these activities may require substantial remedial grading.

The URS report is not a design-level report. This preliminary geotechnical report summarizes the geologic/geotechnical conditions at the site and provides general geotechnical conclusions in order that the applicant/contractor can generally understand the feasibility and amount of work needed for construction. This level of detail is adequate with regard to completion of the Geotechnical Resources section of the EIR. Quantification of earthwork would be determined during final design of each project phase. For that reason, no further response to this comment is provided.

With respect to using the 30-year old Woodward-Clyde report as a basis for project requirements, MM-GEO-1 (page 4.6-20 of the EIR), completion of a final geotechnical investigation specific to the preliminary design of the proposed development, would ensure that geotechnical engineering for the project would be completed in accordance with current industry standards.

- I163-19** The bulk, scale, and architectural character of the Project is analyzed in Chapter 4.1, Aesthetics, of the EIR. In Section 4.1.8, Level of Significance After Mitigation, the EIR determines that impacts to existing visual character and quality associated with Phase II and Phase III would be significant and unavoidable due in part to anticipated high levels of contrast in scale when viewed against existing residential development (see Figures 4.1-13). However, SDSU has eliminated the development of Phases II and III and all associated bulk, scale, and architectural character impacts would be avoided. Additionally, shading and shadow impacts of the Project are also addressed in Chapter 4.1 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.

Responses to Comments – Individuals

Comment Letter I164

6/5/2017

San Diego State University Mail - SDSU New Student Housing Project DEIR Comment



Laura Shinn <lshinn@mail.sdsu.edu>

SDSU New Student Housing Project DEIR Comment

1 message

Michael D Jenkins <eradbami@cox.net>

Sun, Jun 4, 2017 at 9:23 PM

To: LShinn@mail.sdsu.edu, TWhite@calstate.edu, TrusteeSecretariat@calstate.edu, Presidents.Office@sdsu.edu,

PresOff@mail.sdsu.edu, mcollins@mail.sdsu.edu

Cc: Gary Campbell <cveapresident@gmail.com>

Ms. Shinn-

Please accept the attached letter as my comment to the Draft EIR. Thank you

—Mike

I164-1



CVEA - letter to SDSU re DEIR.doc

33K

<https://mail.google.com/mail/u/0/?ui=2&ik=e06d076579&view=pt&cal=Inbox%2FCapital%20Projects%2FNewStudentResidence.html%2FDEIR%20Comments&siml>

Responses to Comments – Individuals

Michael D. Jenkins
5358 Saxon St.
San Diego, CA 92115-1145
eradbami@cox.net

June 4, 2017

Laura Shinn, Director
Facilities Planning, Design, and Construction
San Diego State University
5500 Campanile Drive
San Diego, CA 92182-1624
Sent via email to: LShinn@mail.sdsu.edu

SUBJECT: Comments regarding San Diego State University's New Student Housing Project
Draft Environmental Impact Report

Dear Ms. Shinn:

I am a 29-year resident of the College Area who chose to live near San Diego State University ("SDSU"). I have respect and appreciation for the important contributions that universities make to our society. I have personally attended countless educational, recreational, and cultural events on the SDSU campus, and frequently enjoy walking through its beautiful gardens and grounds. I had the privilege of teaching as an adjunct professor in the College of Business Administration. SDSU is deeply respected because of the moral and intellectual leadership it has provided to the San Diego region.

SDSU's planned New Student Housing Project ("Project") and the related Draft Environmental Impact Report ("DEIR") undermine its reputation of moral and intellectual leadership. This does not bode well for an institution that leads, not just by classroom teaching, but also by providing examples of leadership.

As a now-retired land use attorney, I believe I can say with some knowledge and authority that the Project violates fundamental planning principles, principles taught in SDSU's own well-respected Urban Studies Program, in three important ways:

First, as strictly an exercise in design, the Project ignores physical context. It proposes to interpose density, bulk, and height (14 stories) immediately adjacent to a neighborhood that is built and zoned as a single family neighborhood with no structure exceeding two stories. Even assuming that the density is justified, good planning requires buffer areas and/or a stepping down of height of those elements of the project as they are closer to the adjacent neighborhood.

Second, the Project fails to take into account related planning elements that surround it. SDSU is a large and complex institution that sits within the context of an immediately surrounding neighborhood, a transportation system that services its employees and students, public utilities that service both SDSU and the surrounding residents, and extensive open space that provides habitat and a link to nature. I will defer to others who have commented in detail on the DEIR's failure to address these important planning considerations. Beyond these failures, the DEIR does not take into account anticipated local and regional planning changes that will most certainly impact SDSU and possibly

I164-2

I164-3

I164-4

I164-5

I164-6

Responses to Comments – Individuals

the Project. These include an update to the College Area Community Plan (last updated in 1989) that is expected to include substantial density increases adjacent to the southern edge of the campus to accommodate more student housing, and the re-use of the now-vacant Qualcomm Stadium site, already connected to SDSU by light rail, to possibly include facilities to support SDSU housing and other needs. Finally, the DEIR fails to take into account the City of San Diego's Climate Action Plan, which itself was adopted to comply with State of California mandates.

Third, SDSU followed a process in planning for the Project that, while not a violation of any law, demonstrates a lack of respect and consideration for the interests of those directly affected by the Project. Good planning includes meeting with and taking into account one's neighbors and affected stakeholders, rather than making top-down decisions and bulldozing the Project to completion regardless of how it affects others. This is where SDSU has provided a poor example of moral and intellectual leadership, and let down those of us who have held this institution in high esteem.

I wish to make clear that I support SDSU providing more student housing on campus and its related goal of enhancing student success. I also support using the current Chapultepec parking lot as a component of the Project because doing so could resolve some of the poor transportation planning decisions that have limited that facility's usefulness and created conflicts with the surrounding neighborhood. Finally, I encourage SDSU's planning personnel to engage with neighbors and stakeholders to do "good planning" that results in a project that is not just pretty but is a genuine asset to the broader community.

Sincerely,

Michael D. Jenkins

TO SECRETARIAT OF THE CSU TRUSTEES: PLEASE DISTRIBUTE TO ALL CSU TRUSTEES AND ALTERNATES

1164-6
Cont.

1164-7

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Response to Comment Letter I164

Michael D Jenkins

June 4, 2017

- I164-1** The comment is an introduction to comments that follow. No further response is required.
- I164-2** 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.
- I164-3** 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.
- I164-4** The comment is an introduction to comments that follow. No further response is required.
- I164-5** The bulk, scale, and architectural character of the Project is analyzed in Chapter 4.1, Aesthetics, of the EIR. In Section 4.1.8, Level of Significance After Mitigation, the EIR determines that impacts to existing visual character and quality associated with Phase II and Phase III would be significant and unavoidable due in part to anticipated high levels of contrast in scale when viewed against existing residential development (see Figures 4.1-13). However, SDSU has eliminated the development of Phases II and III and all associated bulk, scale, and architectural character impacts would be avoided. Additionally, shading and shadow impacts of the Project are also addressed in Chapter 4.1 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.
- I164-6** 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.
- I164-7** On March 5, 2014, the San Diego State University's (SDSU) President signed Second Nature's American College and University Presidents Climate Commitment to ensure SDSU's commitment to sustainability (SDSU 2017). The SDSU Climate Action Plan

(CAP) was adopted on May 1, 2017 as part of its commitment to Second Nature's Carbon Commitment pledge to reduce its carbon footprint while educating and inspiring tomorrow's leaders. The CAP provides background on sustainability on the campus; then discusses in detail the greenhouse gas (GHG) inventory; sets goals for GHG and activity reductions; details activity specific assessment, vision, and actions; and provides a draft energy and sustainability policy. The baseline GHG emissions outlined in the CAP showed that 48.4% of emissions come from the natural gas cogeneration power plant, 30.8% of emissions come from student commuting, and 10.8% come from SDSU transportation, with the remaining 10.0% from purchased electricity, solid waste, water/wastewater, and other. The following goals were developed and presented within the CAP:

- SDSU will reduce its campus-wide GHG emissions to 1990 levels by 2020
- SDSU will reduce its operational emissions to 1990 levels by 2025
- Operational carbon neutrality by 2040
- Campus-wide carbon neutrality by 2050
- Reduce water usage 25 percent below 2013 levels by 2020
- Reduce water usage 30 percent below 2013 levels by 2025
- Divert 50 percent of non-Construction and Demolition waste by 2020
- Divert 60 percent of total waste by 2020
- Divert 80 percent of total waste by 2025

These goals were developed to meet or exceed the goals set forth in the California State University Sustainability Policy, State of California's AB 32 and SB 32, Executive Order S-3-05, SB 1078, SB 350, AB 341, and the City of San Diego's CAP.

SDSU CAP Development and Approval

As discussed above, the SDSU CAP was developed as part of the University's Second Nature Carbon Commitment. Since the commitment was put in place, a climate action planning council was formed to oversee and coordinate the development of the CAP. The council includes representatives from SDSU administration, staff, faculty, and students. SDSU formed working groups to complete a baseline GHG inventory. As much of the data gathered for the inventory process came from utility bills, for transportation, a survey was sent out to all campus faculty, staff, administration, and students to determine the means and distance with which they commute to campus. This inventory data provided SDSU CAP collaborators the baseline needed to strategize GHG reduction priorities for the campus. In addition to faculty, staff, students, and administration

Responses to Comments – Individuals

collaborating on the CAP, outside consultants were also contributors to the document. While the principal author of the CAP was Tom Abram, the Assistant Director for Campus Sustainability, Facilities Services, and the CAP was ultimately approved and signed by the SDSU President, Elliot Hirshman.

SDSU CAP and CEQA

Although the SDSU CAP fulfills many of the requirements outlined in the California Environmental Quality Act (CEQA) Guidelines § 15183.5, *Tiering and Streamlining the Analysis of GHG Emissions*, it does not comply with subsection (b)(1)(F) which requires the plan to be adopted in a public process following environmental review. Because the SDSU CAP is not a qualified “Plan for the Reduction of GHG Emissions” as set forth in the CEQA Guidelines, it may not be used in a cumulative impacts analysis within a CEQA document to determine significance per CEQA Guidelines § 15064.4(b)(3). However, the CAP may be included in a CEQA document for information purposes only.

New Student Housing Project’s Consistency with SDSU CAP

As discussed above, the SDSU CAP is not a CEQA certified GHG reduction plan; however, for informational purposes only, the Student Housing Project’s consistency is evaluated against the SDSU CAP’s goals and GHG emission reduction measures in Table 1 below. Other CAP objectives that do not apply to the project were not included in the consistency analysis.

Table 1
SDSU CAP Consistency Analysis

Measure Number	Policy Objective or Strategy	Consistency Analysis
<i>Energy</i>		
1.2.1	Implement an EIS that captures the core functionality needed, including utility bill management, auxiliary recharge, existing building-level metering, dashboards and fault-detection diagnostics.	<i>Consistent.</i> The project would include sub-metering on each building and state-of-the-art building information systems to monitor, track, and manage the energy systems within the project.
1.2.3	Continue the campus-wide metering effort to install building-level meters of all utilities. Any major renovations, controls retrofits or MBCx projects will install building-level metering at a minimum.	<i>Consistent.</i> The project would include sub-metering on each building and state-of-the-art building information systems to monitor, track, and manage the energy systems within the project.
1.3.3	Begin adjusting heating and cooling temperatures. Buildings with zone-level control should decrease heating and increase cooling temperatures until the targets of 68-70° F and 74-76° F are reached.	<i>Consistent.</i> The project would include state-of-the-art building information systems to monitor, track, and manage the energy systems within the project. The project’s HVAC systems would be maintained within the SDSU guidelines to reduce energy usage.

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Table 1
SDSU CAP Consistency Analysis

Measure Number	Policy Objective or Strategy	Consistency Analysis
1.3.4	Ensure that a preventative maintenance schedule is in place for controls systems.	<i>Consistent.</i> The project would be included in the budget for replacing mechanical equipment.
1.5.1	Begin conducting a minimum of three MBCx projects each year, increasing to five. Complete commissioning of all major buildings by 2025.	<i>Consistent.</i> The project will be commissioned as part of the construction process. The project will then be re-commissioned on the schedule set by SDSU.
1.7.1	Implement ENERGY STAR and energy-efficiency purchasing requirements. Computers, monitors and other devices that qualify for the Electronic Product Environment Assessment Tool will be certified at a Silver level.	<i>Consistent.</i> The project would include the installation of ENERGY STAR equipment where available.
1.8.1	Support Associated Students in its efforts to install additional solar capacity to meet its goals.	<i>Consistent.</i> The project will be using power from the campus mix which currently includes 4% from solar projects. Another 19% of electricity comes from the grid, which is comprised of 34.5% renewable sources. The campus also has a solar power master plan which guides the development of solar power projects on campus. The solar power master plan and campus general plan maintain that solar projects will be installed on parking lots and vacant land, not on buildings. The project is consistent with this policy and measure.
1.8.4	Include solar in LEED projects to achieve net zero energy at the building or from panels installed elsewhere on campus.	<i>Consistent.</i> The project will be using power from the campus mix which currently includes 4% from solar projects. Another 19% of electricity comes from the grid, which is comprised of 34.5% renewable sources. The campus also has a solar power master plan which guides the development of solar power projects on campus. The solar power master plan and campus general plan maintain that solar projects will be installed on parking lots and vacant land, not on buildings. The project is consistent with this policy and measure.
<i>Transportation</i>		
2.1.1	Enroll the campus community in pretax benefits for transit.	<i>Consistent.</i> The project's employees will be included in the transit program once implemented.
2.1.4	Continue to improve and increase on-campus housing and amenities.	<i>Consistent.</i> The project includes housing for students and a dining common. The project also includes onsite recreation.

Responses to Comments – Individuals

Table 1
SDSU CAP Consistency Analysis

Measure Number	Policy Objective or Strategy	Consistency Analysis
2.1.6	Improve bicycle and pedestrian amenities – install bike-repair stations, access to bike lockers and shower facilities, explore bike-share option and conduct extensive marketing.	<i>Consistent.</i> The project includes on-site bike parking for all residents and employees.
<i>Water</i>		
3.1.3	Convert identified nonprogrammable lawns to drought-tolerant landscaping with high-efficient irrigation. SDSU has retained a landscape architect to survey existing turf areas in an effort to reduce environmental impact and improve aesthetics.	<i>Consistent.</i> The project will include turf for recreational and event purposes only. No aesthetic turf is included in the project. All other landscaping is drought tolerant.
3.3.5	Continually test new, more-efficient fixtures.	<i>Consistent.</i> The project will include low-flow high efficient water fixtures for all dormitories.
<i>Waste</i>		
4.1.5	Prepare for and participate in post-consumer food composting when locally available.	<i>Consistent.</i> The projects dining commons will participate in the food waste composting program when established campus wide.
4.2.4	Engage in comprehensive recycling outreach program within housing and during orientation.	<i>Consistent.</i> The project would include recycling and waste diversion outreach during new student orientation.
<i>Preventive Maintenance</i>		
5.1.3	Continue regular irrigation system checks.	<i>Consistent.</i> The project would conduct regular irrigation system checks in collaboration with the grounds maintenance departments.
<i>New Construction and Renovations</i>		
6.1.1	Adopt LEED Silver certification as the campus standard for new construction and major renovation. All projects over \$10 million will trigger certification requirements. Projects will be analyzed for feasibility to achieve a Gold or Platinum rating.	<i>Consistent.</i> The project was designed and will be certified to at least a LEED Silver rating. The project will evaluate the feasibility of certification at a higher level once the design is finalized.
6.1.4	Require the use of total-cost-of-ownership model, with inputs from capital costs, energy models and anticipated maintenance and replacement costs.	<i>Consistent.</i> The SDSU evaluated the feasibility of this project based on a lifecycle model, which evaluated total cost of ownership. This resulted in a design that increased daylighting, included green roofs, and highlighted the use of alternative transportation.
<i>Food</i>		
7.1.1	Analyze total sustainable food purchases with both the Real Food Challenge and Certified Green Restaurant standards. Increase sustainable food purchases to meet the CSU sustainability policy goal of 20% by 2020.	<i>Consistent.</i> The project's dining commons will implement a sustainable food purchasing program in accordance with the campus policy.

Table 1
SDSU CAP Consistency Analysis

Measure Number	Policy Objective or Strategy	Consistency Analysis
7.1.2	Ensure all food vendors to be certified as Level 2 under the Certified Green Restaurant standards.	<i>Consistent.</i> The project's dining commons will require all food vendors supplying the project to be certified to a Level 2 under the Certified Green Restaurant standards.
7.1.4	Provide additional vegan and vegetarian options and outreach to reduce meat intake and related carbon emissions.	<i>Consistent.</i> The project's dining commons will include vegan and vegetarian options for residents and guests.
<i>Engagement</i>		
8.1.8	Include sustainability training in new employee onboarding.	<i>Consistent.</i> SDSU will include sustainability training to new employees at the project.
<i>Housing and Residential Life</i>		
8.2.1	Provide and improve sustainability guidance at orientation and as residents move into the halls.	<i>Consistent.</i> The project would include sustainability guidance during new student orientation to support move-in.
8.2.2	Include sustainability and recycling information in the student handbook provided to new students during orientation.	<i>Consistent.</i> The project will include sustainability and recycling information in the new student handbook during orientation.
8.2.6	Educate residence hall and apartment staff on sustainability during summer training.	<i>Consistent.</i> The project would participate in the summer training for staff, which will include sustainability.
8.2.8	Advertise move-in as a zero-waste event.	<i>Consistent.</i> The project will advertise move-in as a zero-waste event and will coordinate with Campus Housing to maximize solid waste diversion during the event.

Source: SDSU 2017

As shown in Table 1, the project would be consistent with all applicable policy measures in the CAP. The project would support the CAP's goals and measures and help SDSU reduce GHG emissions from one of its largest sources, student commuting, by providing on-campus housing with no on-site parking.

Conclusions

The SDSU CAP was developed in collaboration with various stakeholders throughout campus and has the support of the SDSU President. The CAP outlines how SDSU will reduce its GHG emissions to meet its 2040 and 2050 goals. The CAP is not a qualified GHG reduction plan under CEQA and thus cannot be used to determine significance within a CEQA document. However, as shown in Table 1, the project would still be consistent with all applicable policy measures within the CAP.

I164-8 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

Responses to Comments – Individuals

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

I164-9 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 EIR. For that reason, no further response to this comment is provided.

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Responses to Comments – Individuals

Comment Letter I165



Laura Shinn <lshinn@mail.sdsu.edu>

DORM PROJECT AND EIR JUNE 2017

1 message

Richard McClintock <richardwmcc@hotmail.com>
To: "LShinn@sdsu.edu" <LShinn@sdsu.edu>

Sun, Jun 4, 2017 at 5:19 PM

PLEASE DO THE RIGHT THING...You and SDSU know what it means.. I am disappointed the way this has been handled by SDSU we are Alums and two sons.. Build within the campus where there are many sites and not in the canyon...DO THE RIGHT THING you know what it means..

I165-1

Please take to HEART

Richard McClintock

Class 68

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Response to Comment Letter I165

Richard McClintock

June 4, 2017

- I165-1** 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.

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References

8 CCR 3203. Injury and Illness Prevention Program.

8 CCR 5144. Respiratory Protection.

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California Department of Public Health. 2016. *Yearly Summaries of Selected General Communicable Diseases in California, 2011-2015*. August 2016.

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