Appendix CAir Quality Technical Memorandum, SDSU Plaza LindaVerde EIR Addendum, DUDEK, March 2014

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TECHNICAL MEMORANDUM

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From:	Stephanie Tang, Environmental Planner
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Cc:	Michael Haberkorn, Gatzke, Dillon & Ballance
Subject:	San Diego State University Plaza Linda Verde EIR Addendum –
	Air Quality Analysis
Date:	March 25, 2014
Attachments:	Figures 1–4

This memorandum provides the air quality impact analysis for proposed revisions to the previously approved San Diego State University (SDSU) Plaza Linda Verde project located in San Diego, California, and is prepared as part of an Addendum to the Plaza Linda Verde Final Environmental Impact Report (EIR) (May 2011).

The memorandum is intended to (1) briefly summarize the air quality impacts and significance conclusions identified in the May 2011 SDSU Plaza Linda Verde Final EIR and (2) discuss whether the proposed revisions would result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the May 2011 Final EIR.

1 PROJECT LOCATION AND DESCRIPTION

The proposed project site is located on the SDSU campus, within the College Area of the City of San Diego (City), San Diego County, California (see Figure 1, Regional Map, and Figure 2, Vicinity Map). Specifically, the project site is located generally between Aztec Walk and Montezuma Road in the southeastern portion of campus (see Figure 3, Project Area).

The proposed project consists of a mixed-use project that would straddle both east and west sides of College Avenue between the SDSU Transit Center/Pedestrian Bridge and Montezuma Road (see Figure 4, Proposed Site Plan). The project would include commercial/retail uses on the first floor of several buildings and residential uses on the upper floors. A stand-alone parking structure would also be constructed west of College Avenue. The project was analyzed in the Plaza Linda Verde EIR, which was finalized and certified in May 2011. Table 1 provides a summary of all buildings proposed and analyzed in the May 2011 Final EIR.

As SDSU has proceeded with preliminary project planning and design, several modifications to the approved project are being proposed. These changes include modifications to Buildings 1, 2, and 3 (all located west of College Avenue) and are summarized in Table 2. No changes to Buildings 4, 5, 6, or 7 would occur; however, details related to these buildings have been provided in Tables 1 and 2 for informational purposes. Additionally, no changes to the building footprints or project area are proposed.

	Total	Retail	Rentable	Residential	Housir	ng Units			
Project Components	Size (GSF)	Square Feet (GSF)	Square Feet (SF)	Square Feet (GSF)	Apartment Style	Dormitory Style	Beds	Parking Spaces	Building Stories
Building 1	118,550	25,000	24,340	93,550	84	0	352	0	5
Building 2	85,640	20,000	17,975	65,640	60	0	264	0	5
Building 3 (Parking Structure)	128,925	2,000	1,815	0	0	0	0	342	5*
Building 4	123,004	23,000	13,445	100,004	63	0	256	69–110	5
Building 5	157,971	20,000	19,634	137,971	87	0	344	91–110	5
Building 6	48,070	0	0	48,070	44	0	192	0	4
Building 7	55,300	0	0	55,300	52	0	224	0	4
Total	717,460	90,000	77,209	500,535	390	0	1,632	502-562	n/a

Table 1Approved – May 2011 Plaza Linda Verde Final EIR

Note:

GSF = gross square feet.

* The approved parking structure consisted of one subterranean story and four aboveground stories.

Table 2Revised – March 2014 Addendum to the May 2011 Final Plaza Linda Verde EIR

	Total	Retail	Rentable	Residential	Housin	g Units			
Project Components	Size (GSF)	Square Feet (GSF)	Square Feet (SF)	Square Feet (GSF)	Apartment Style	Dormitory Style	Beds	Parking Spaces	Building Stories
Building 1*	139,329	20,553	19,902	119,329	85**	187	359	0	6
Building 2*	117,387	14,868	14,056	102,519	68**	158	300	0	6
Building 3 (Parking Structure)*	143,693	0	0	0	0	0	0	392	7
Building 4	123,004	23,000	13,445	100,004	63	0	256	69–110	5
Building 5	157,971	20,000	19,634	137,971	87	0	344	91–110	5
Building 6	48,070	0	0	48,070	44	0	192	0	4
Building 7	55,300	0	0	55,300	52	0	224	0	4
Total	784,754	78,421	67,037	563,193	399	345	1,675	552-612	n/a

Notes:

*Buildings that have changed since the May 2011 Final EIR and are the subject of the March 2014 Addendum analysis

Apartment equivalent has been calculated. The total housing units planned for Buildings 1 and 2 should be conveyed in either "apartment style" or "dormitory style" numbers, not both. For example, Building 1 would include 85 apartment style units **OR 187 dormitory style units, not both.

GSF = gross square feet.



As indicated in Table 2, the proposed changes to the previously approved project would include a change in residential units from apartment-style units to dormitory-style rooms. Table 2 shows the number of dormitory-style rooms (345) that would be built in Buildings 1 and 2 and their associated apartment-equivalent (153). Other changes include an increase in total gross square footage from 717,460 to 784,754; a decrease in retail gross square footage from 90,000 to 78,421; an increase in residential gross square footage from 500,535 to 563,193; an increase in overall bed count from 1,632 to 1,675; and the addition of 50 parking spaces to Building 3. The increased square footage is associated with an increase in one additional floor to each building. The additional floor would add approximately 11 feet in height to Buildings 1 and 2. The additional three aboveground floors of Building 3 would result in a building height of 100 feet.

2 METHODS

The May 2011 SDSU Plaza Linda Verde Final EIR Air Quality and Global Climate Change section was reviewed and the air quality impacts and significance conclusions identified from the original project are briefly summarized below. This technical memorandum will discuss air quality impacts that would result from implementation of project modifications to the originally approved project and qualitatively evaluate the potential changes in construction emissions and operational emissions due to the modified project.

3 SUMMARY OF PLAZA LINDA VERDE EIR IMPACTS AND CONCLUSIONS

3.1 Consistency with Applicable Air Quality Plans

The May 2011 SDSU Plaza Linda Verde Final EIR determined that the originally approved project would be consistent with the City of San Diego General Plan and consistent with the San Diego Regional Air Quality Strategy (RAQS) and Attainment Plan. The May 2011 SDSU Plaza Linda Verde Final EIR concluded that the originally approved project would be consistent with applicable air quality plans.

3.2 Air Pollutant Emissions

Construction-Related Emissions

Tables 3 and 4 (reproduced Final EIR Tables 3.2-7 and 3.2-8, respectively) present estimated maximum daily construction emissions for Phase I and Phase II construction activities of the originally approved project, respectively, based on application of construction-related project design features required by the San Diego Air Pollution Control District (SDAPCD).

Construction Project/Phase	VOC	NOx	со	SOx	PM 10	PM2.5	
		Den	nolition				
Fugitive Dust	_	_	_	_	11.76	2.45	
Off-Road Diesel	1.65	11.52	7.24	0.00	0.85	0.78	
On-Road Diesel	0.68	10.20	3.48	0.01	0.44	0.37	
Worker Trips	0.05	0.08	1.53	0.00	0.01	0.01	
Total	2.38	21.80	12.25	0.02	13.06	3.61	
Significance Threshold	137	250	550	250	100	100	
Above Threshold?	No	No	No	No	No	No	
		Site	Grading				
Fugitive Dust	_	—	_	_	2.13	0.45	
Off-Road Diesel	4.61	36.41	20.11	0.00	2.04	1.87	
Worker Trips	0.06	0.10	1.78	0.00	0.01	0.01	
Total	4.67	36.51	21.89	0.00	4.18	2.33	
Significance Threshold	137	250	550	250	100	100	
Above Threshold?	No	No	No	No	No	No	
		Soil	Export		•		
Fugitive Dust	—	—	—	—	16.54	3.45	
Off-Road Diesel	0.99	14.78	5.04	0.02	0.64	0.54	
Total	0.99	14.78	5.04	0.02	17.18	3.99	
Significance Threshold	137	250	550	250	100	100	
Above Threshold?	No	No	No	No	No	No	
		Building (Construction				
Building Construction Off- Road Diesel	6.59	37.88	23.28	0.00	2.76	2.54	
Building Construction Vendor Trips	0.24	3.02	2.46	0.01	0.14	0.12	
Building Construction Worker Trips	0.45	0.76	14.08	0.01	0.11	0.06	
Total	7.28	41.66	39.82	0.02	3.01	2.71	
Significance Threshold	137	250	550	250	100	100	
Above Threshold?	No	No	No	No	No	No	
Paving – Parking Structure							
Asphalt Offgassing	0.04	—	—	—	—	—	
Paving Off-Road Diesel	4.18	30.11	15.54	0.00	2.00	1.84	
Paving On-Road Diesel	0.01	0.11	0.04	0.00	0.00	0.00	
Paving Worker Trips	0.09	0.15	2.83	0.00	0.02	0.01	
Total	4.32	30.37	18.41	0.00	2.02	1.85	
Significance Threshold	137	250	550	250	100	100	
Above Threshold?	No	No	No	No	No	No	

Table 3Phase I Construction Emissions (lbs/day)

Construction	VOC	NO	<u> </u>	\$0	DM.	DM
FIOJECUFIIdSe	V0C			30x	F 1 VI 10	F 1V12.5
		Paving	– General		r	T
Asphalt Offgassing	0.03		—	_	—	—
Paving Off-Road Diesel	2.34	14.35	8.99	0.00	1.24	1.14
Paving On-Road Diesel	0.01	0.08	0.03	0.00	0.00	0.00
Paving Worker Trips	0.06	0.10	1.89	0.00	0.02	0.01
Total	2.44	14.53	10.91	0.00	1.26	1.15
Significance Threshold	137	250	550	250	100	100
Above Threshold?	No	No	No	No	No	No
		Architectura	al Coating Use			•
Architectural Coating Offgassing	32.29	—	—	—	—	—
Architectural Coatings Worker Trips	0.02	0.04	0.78	0.00	0.01	0.00
Total	32.31	0.04	0.78	0.00	0.01	0.00
Significance Threshold	137	250	550	250	100	100
Above Threshold?	No	No	No	No	No	No
Maximum Simultaneous Construction Emissions*	45.82	83.88	68.15	0.03	21.36	6.32
Significance Threshold	137	250	550	250	100	100
Above Threshold?	No	No	No	No	No	No

Table 3Phase I Construction Emissions (lbs/day)

Source: SDSU 2011.

Notes:

* Maximum simultaneous emissions for all pollutants except PM₁₀ and PM_{2.5} occur during simultaneous building construction, parking structure construction, parking area construction, and architectural coatings application. Maximum simultaneous emissions of PM₁₀ and PM_{2.5} occur during grading and soil export.

VOC – volatile organic compounds

NO_x – oxides of nitrogen

CO - carbon monoxide

 SO_x – sulfur oxides

 $\mathsf{PM}_{10}-\mathsf{particulate}$ matter with aerodynamic diameter less than or equal to 10 microns

PM_{2.5} – particulate matter with aerodynamic diameter less than or equal to 2.5 microns

Construction Project/Phase	VOC	NOx	со	SOx	PM 10	PM _{2.5}		
Demolition								
Fugitive Dust	_	_	_	_	48.38	10.06		
Off-Road Diesel	1.96	13.52	9.24	0.00	0.91	0.84		
On-Road Diesel	2.37	33.10	11.65	0.06	1.46	1.21		
Worker Trips	0.07	0.11	2.18	0.00	0.02	0.01		
Total	4.39	46.72	23.07	0.06	50.78	12.12		
Significance Threshold	137	250	550	250	100	100		
Above Threshold?	No	No	No	No	No	No		
		Site	Grading		•	•		
Fugitive Dust	—	—	—	—	2.98	0.62		
Off-Road Diesel	5.63	43.99	26.16	0.00	2.30	2.12		
Worker Trips	0.06	0.10	1.97	0.00	0.01	0.01		
Total	5.69	44.10	28.12	0.00	5.30	2.75		
Significance Threshold	137	250	550	250	100	100		
Above Threshold?	No	No	No	No	No	No		
		Soil	Export					
Fugitive Dust	—	—	—	—	21.03	4.39		
Off-Road Diesel	0.61	8.52	3.00	0.02	0.38	0.31		
Total	0.61	8.52	3.00	0.02	21.41	4.70		
Significance Threshold	137	250	550	250	100	100		
Above Threshold?	No	No	No	No	No	No		
		Building (Construction					
Building Construction Off- Road Diesel	4.36	25.13	16.84	0.00	1.61	1.48		
Building Construction Vendor Trips	0.32	3.78	3.34	0.01	0.18	0.15		
Building Construction Worker Trips	0.56	0.95	18.13	0.02	0.16	0.05		
Total	5.24	29.87	38.30	0.03	1.74	1.52		
Significance Threshold	137	250	550	250	100	100		
Above Threshold?	No	No	No	No	No	No		
Paving – General								
Asphalt Offgassing	0.04	—	—	—	—	—		
Paving Off-Road Diesel	2.06	12.89	8.85	0.00	1.06	0.98		
Paving On-Road Diesel	0.01	0.09	0.03	0.00	0.00	0.00		
Paving Worker Trips	0.05	0.08	1.62	0.00	0.02	0.01		
Total	2.16	13.06	10.50	0.00	1.08	0.99		
Significance Threshold	137	250	550	250	100	100		
Above Threshold?	No	No	No	No	No	No		

Table 4Phase II Construction Emissions (lbs/day)

Construction						
Project/Phase	VOC	NOx	CO	SOx	PM 10	PM2.5
		Architectura	al Coating Use			
Architectural Coating Offgassing	48.61	—	—		—	—
Architectural Coatings Worker Trips	0.03	0.05	1.01	0.00	0.01	0.01
Total	48.64	0.05	1.01	0.00	0.01	0.01
Significance Threshold	137	250	550	250	100	100
Above Threshold?	No	No	No	No	No	No
Maximum Simultaneous Construction Emissions*2	55.60	47.62	47.76	0.06	50.78	12.12
Significance Threshold	137	250	550	250	100	100
Above Threshold?	No	No	No	No	No	No

 Table 4

 Phase II Construction Emissions (lbs/day)

Source: SDSU 2011.

Notes:

* Maximum simultaneous emissions for VOC and CO occur during simultaneous building construction, paving, and architectural coatings use. Maximum simultaneous emissions of NO_x, SO_x, PM₁₀, and PM_{2.5} occur during demolition activities.

As shown on Tables 3 and 4, emissions of all criteria pollutants would be below the significance thresholds. Accordingly, the May 2011 SDSU Plaza Linda Verde Final EIR concluded that construction emissions from Phase I and Phase II of the originally approved project would be less than significant and no mitigation would be required.

Operational-Related Emissions

It was assumed that the first year of full occupancy for the originally approved project would be 2013 for Phase I and 2015 for Phase II. Two project design features that were considered in the analysis included the Leadership in Energy and Environmental Design (LEED) Silver rating and the use of low-VOC architectural coatings. Table 5 (reproduced Final EIR Table 3.2-9) presents the results of the emission calculations for the originally approved project operational-related emissions, and includes the two emission reduction features (LEED Silver rating and use of low-VOC architectural coatings).

	VOC	NOx	CO	SOx	PM 10	PM2.5			
	Summer Day (lbs/day)								
Natural Gas Combustion	0.24	3.11	1.61	0.00	0.01	0.01			
Landscaping	0.25	0.04	3.09	0.00	0.01	0.01			
Consumer Products	19.57	—	—	—	—	—			
Architectural Coatings	1.46	—	—	—	—	—			
Vehicular Emissions	18.05	20.30	188.29	0.19	33.89	6.57			
Total	39.57	23.45	192.99	0.19	33.91	6.59			
Significance Threshold	137	250	550	250	100	55			
Above Threshold?	No	No	No	No	No	No			
		Winter D	ay (lbs/day)						
Natural Gas Combustion	0.24	3.11	1.61	0.00	0.01	0.01			
Consumer Products	19.57	—	—	—	—	—			
Architectural Coatings	1.46	_	—	—	—	—			
Vehicular Emissions	17.00	29.63	202.84	0.17	33.89	6.57			
Total	38.27	32.74	204.45	0.17	33.9	6.58			
Significance Threshold	137	250	550	250	100	55			
Above Threshold?	No	No	No	No	No	No			

Table 5 Operational Emissions

Source: SDSU 2011.

As shown in Table 5, the originally approved project's operational emissions would not exceed the significance thresholds. Accordingly, the May 2011 SDSU Plaza Linda Verde Final EIR concluded that impacts would be considered less than significant for Phase I and Phase II operational emissions and mitigation is not required.

3.3 Cumulative Net Increase in Criteria Pollutants

The May 2011 Final SDSU Plaza Linda Verde EIR determined that construction-related emissions associated with the originally approved project would be substantially below the screening criteria (see Tables 3 and 4). The EIR noted that VOC emissions would be 0.23%, NO_x emissions would be 0.19%, and PM₁₀ emissions would be 1.9% of the nonattainment pollutants in the San Diego Air Basin. The EIR concluded that these construction-related emissions would be short-term and would not result in cumulative considerable impacts to the ambient air quality.

With respect to operational-related emissions, the originally approved project was determined to be consistent with current San Diego Association of Governments (SANDAG) growth forecasts for the area and would not increase student enrollment. Since the originally approved project

would not increase enrollment, emissions were determined to be consistent with the attainment demonstration in the State Implementation Plan and would not be cumulatively considerable.

3.4 Sensitive Receptors

Carbon Monoxide Hotspots

Table 6, CO "Hotspots" Modeling Results (reproduced Final EIR Table 3.2-10), presents a summary of the predicted carbon monoxide (CO) concentrations for the intersections evaluated for the near-term and long-term scenarios (near-term and long-term refer to scenarios evaluated in the Traffic Impact Analysis for the originally approved project).

Intersection	Near-Term					
Near-Term Conditions						
Maximum 1-hour Concentration Plus Background, ppm						
CAAQS = 20 ppm, NAAQS = 35 ppm, Background 5.3 ppm						
AM PM						
College Avenue and EB I-8	6.9	N/A				
College Avenue and Canyon Crest Drive	6.5	6.6				
College Avenue and Zura Way	6.7	6.8				
College Avenue and Montezuma Road	6.5	7.0				
College Avenue and El Cajon Boulevard	N/A	6.6				
Montezuma Road and Campanile Way	N/A	6.3				
Maximum 8-hour Concent	ration Plus Background, ppm					
CAAQS= 9.0 ppm; NAAQS =	9 ppm; Background 3.27 ppm					
College Avenue and EB I-8 Ramps	4.	39				
College Avenue and Canyon Crest Drive	4.18					
College Avenue and Zura Way	4.	32				
College Avenue and Montezuma Road	4.	46				
College Avenue and El Cajon Boulevard	4.18					
Montezuma Road and Campanile Way	3.	97				
Long Terr	n Conditions					
Maximum 1-Hour Concentration Plus Background. ppm						
CAAQS = 20 ppm; NAAQS = 35 ppm; Background 5.3 ppm						
	AM	PM				
College Avenue and EB I-8 Ramps	N/A	6.0				
College Avenue and Canyon Crest Drive	6.0	5.9				
College Avenue and Zura Way	5.9	6.0				
College Avenue and Montezuma Road	5.8	6.0				

Table 6CO "Hotspots" Modeling Results

Intersection	Near-Term				
Montezuma Road and 55th Street	5.7	5.8			
Montezuma Road and Campanile Way	5.6	5.8			
Maximum 8-Hour Concentration Plus Background, ppm CAAQS = 9.0 ppm; NAAQS = 9 ppm; Background 3.27 ppm					
College Avenue and EB I-8 Ramps	3.7	76			
College Avenue and Canyon Crest Drive	3.76				
College Avenue and Zura Way	3.76				
College Avenue and Montezuma Road	3.76				
Montezuma Road and 55 th Street	3.6	52			
Montezuma Road and Campanile Way	3.6	52			

Table 6CO "Hotspots" Modeling Results

Source: SDSU 2011.

CAAQS – California Ambient Air Quality Standard NAAQS – National Ambient Air Quality Standard

nnm – narts ner million

ppm – parts per million

As shown in Table 6, the predicted CO concentrations would be substantially below the 1-hour and 8-hour National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for CO. Therefore, the May 2011 SDSU Plaza Linda Verde Final EIR concluded no exceedances of the air quality standards for CO are predicted, and the originally approved project would not cause or contribute to a violation of the CO standards.

The May 2011 SDSU Plaza Linda Verde Final EIR noted that under an existing-plus-project scenario, the Traffic Impact Analysis identified the following four intersections as operating at level of service (LOS) E or worse:

- College Avenue and Eastbound Interstate 8 (I-8) Ramps (a.m. peak hour)
- College Avenue and Canyon Crest Drive (p.m. peak hour)
- College Avenue and Zura Way (a.m. peak hour)
- College Avenue and El Cajon Boulevard (p.m. peak hour).

Each of these four intersections was modeled as part of the CO hotspots analysis presented in Table 6, and the CO concentrations at each intersection were below the applicable significance threshold. Because the traffic volumes modeled under the existing-plus-project scenario do not include cumulative projects, traffic volumes at these intersections under this scenario are lower than under the near-term scenario analyzed above, which includes cumulative traffic. As such, CO concentrations would be lower under the existing-plus-project scenario than under the near-term scenario, and impacts would be less than significant.

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The May 2011 SDSU Plaza Linda Verde Final EIR determined that neither the constructionnor operational-related emissions would violate any air quality standard or contribute substantially to an existing or projected air quality violation, nor would the emissions expose sensitive receptors to substantial pollutant concentrations.

Toxic Air Contaminants

Residential dwellings and retail uses are not land uses that would emit substantial amounts of toxic air contaminants (TACs). Minor amounts of truck traffic would be associated with deliveries to the retail uses; however, the truck traffic would be minimal and would not result in substantial emissions of diesel particulate matter. Thus, the originally approved project would not expose sensitive receptors to substantial concentrations of TACs; therefore, impacts would be less than significant.

3.5 Odors

Project construction may result in the emission of minor amounts of odor compounds associated with diesel, heavy-duty equipment exhaust. However, any odors associated with construction activities would be temporary. The originally approved project includes residential and retail uses that are not land uses that would be sources of nuisance odors. Thus, impacts related to odors would be less than significant.

4 ANALYSIS OF PROJECT CHANGES

4.1 Consistency with Applicable Air Quality Plans

Based on Tables 1 and 2, the proposed changes to the previously approved project would increase the number of beds in Buildings 1 and 2 from 616 to 659; no change is proposed for the other buildings. Additionally, the proposed retail space in Buildings 1 and 2 would decrease from 45,000 gross square feet to 35,421 gross square feet. In light of these limited modifications relative to the approved project, the modified project is consistent with the approved project and therefore would not result in a conflict with or obstruct implementation of the applicable air quality plan. No change in significance determination would occur as a result of the modified project.

4.2 Air Pollutant Emissions

Construction-Related Emissions

As indicated in Tables 1 and 2, the proposed changes to the previously approved project would result in an increase of total gross square footage for Building 1 from 118,550 to 139,329, an increase in total gross square footage for Building 2 from 85,640 to 117,387, and an increase in total gross square footage for Building 3 from 128,925 to 143,693. The increased square footage is associated with an increase in one additional floor to Buildings 1, 2, and 3. However, no changes to the building footprints or project area are proposed.

It is assumed that the construction methods and type of construction equipment would remain the same for the modified project. The increase in square footage and additional story for Buildings 1, 2, and 3 would likely result in a longer construction period but likely show the same order of magnitude in emissions to the originally approved project, reflecting similar daily levels of activity. In addition, several years have passed since the original analysis was prepared. With implementation of more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles, the emissions from equipment and vehicles would likely be lower if the modified project were to commence construction in the next year or two. Since the original estimated construction emissions were well below the significance thresholds as shown on Tables 3 and 4, construction of the modified project would not be likely to exceed the significance thresholds. The modified project is not anticipated to result in new significant impacts nor result in a substantial change in the previously identified impacts. No change in significance determination would occur as a result of the modified project.

Operational-Related Emissions

As indicated in Tables 1 and 2, the proposed changes to the previously approved project would result in a decrease of retail uses and an increase in residential use. The increase in the number of residential units would allow more students to live on campus and likely result in fewer vehicle trips coming in and out of the college area as students are able to have better walking and biking access to campus facilities and classes compared to living off-campus. Furthermore, the amount of retail space would be decreased, resulting in the generation of fewer vehicle trips and associated emissions. In the previous air quality analysis, consumer product emissions also represented a major contribution to the project emissions; however, these emissions are not expected to increase substantially as a result of increasing the residential units. The remaining emissions from area sources (e.g., natural gas usage for space and water heating) would be a relatively low contribution to the project total. Because the original estimated operational emissions were well below the significance thresholds as shown on Table 5 and given that more

students would live on campus, thereby likely reducing the number of vehicle trips in and out of the college area, and fewer retail trips would be generated, operation of the modified project would not exceed the significance thresholds. No change in significance determination would occur as a result of the modified project.

4.3 Cumulative Net Increase in Criteria Pollutants

Since 2011, there may be a slight increase in the future/planned projects in the vicinity of the project area. However, it is unlikely that major construction of all future/planned projects would occur simultaneously. Since no changes to the building footprints or project area are proposed with the modified project and construction and operational emissions would be similar to that analyzed in the EIR, the modified project would not result in a cumulative net increase in criteria pollutants. No change in significance determination would occur as a result of the modified project.

4.4 Sensitive Receptors

Carbon Monoxide Hot Spots

As previously discussed, there is the possibility that the reduction in retail/commercial square footage of the modified project would result in a reduction in vehicle trips relative to the approved project. However, for purposes of this analysis, it was assumed that no change in traffic patterns or volumes over what was disclosed in the May 2011 SDSU Plaza Linda Verde Final EIR would occur. Moreover, local background CO concentrations have continued to decrease since 2008 (the year of the latest data used for the CO hotspots analysis). Therefore, the predicted CO concentrations for the intersections evaluated for the near-term and long-term scenarios in Table 6 would remain approximately the same. Accordingly, no exceedances of the air quality standards for CO are predicted, and the modified project would not cause or contribute to a violation of the CO standards.

As was determined for the originally approved project, the CO concentrations at the four intersections operating at LOS E or worse (College Avenue and Eastbound I-8 Ramps (a.m. peak hour), College Avenue and Canyon Crest Drive (p.m. peak hour), College Avenue and Zura Way (a.m. peak hour), and College Avenue and El Cajon Boulevard (p.m. peak hour)) are also determined to be below the applicable significance threshold due to the reduced number of project vehicle trips. Thus, neither the construction- nor operational-related emissions would violate any air quality standard or contribute substantially to an existing or projected air quality violation, nor would the emissions expose sensitive receptors to substantial pollutant concentrations. No change in significance determination would occur as a result of the modified project.

Toxic Air Contaminants

As previously stated, residential dwellings and retail uses are not land uses that would emit substantial amounts of TACs. Similar to the originally approved project, the truck traffic from implementation of the modified project would be minimal and would not result in the substantial emissions of diesel particulate matter. Thus, the modified project would not expose sensitive receptors to substantial concentrations of TACs; therefore, impacts would be less than significant. No change in significance determination would occur as a result of the modified project.

4.5 Odors

Similar to the originally approved project, any odors associated with construction activities would be temporary. The same land uses (residential and retail uses) are proposed under the modified project, which are not land uses that would be sources of nuisance odors. Thus, impacts related to odors would be less than significant. No change in significance determination would occur as a result of the modified project.

5 CONCLUSIONS

Based on a review of the Plaza Linda Verde Final EIR and the revisions now proposed to the approved project, the proposed revisions would not result in any new significant effects, nor would the revisions result in a substantial increase in the severity of significant effects previously identified in the Final EIR. Because no new significant impacts would occur, nor would there be a substantial increase in the severity of previously identified significant effects, no additional mitigation measures beyond those identified in the May 2011 Plaza Linda Verde Final EIR would be required.

6 REFERENCES

SDSU (San Diego State University). 2011. *Final Environmental Impact Report. Plaza Linda Verde. State Clearinghouse No. 2009011040.* Prepared for Board of Trustees of the California State University. Prepared by San Diego State University. May 2011.

7 LIST OF PREPARERS

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Sincerely,

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David Deckman Director of Air Quality Services

cc: Sarah Lozano, AICP, Principal Jennifer Longabaugh, LEED AP ND, Environmental Planner



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Project Area



SDSU Plaza Linda Verde Air Quality Analysis



Figure 4 Proposed Site Plan