

San Diego State University
Aztec Recreation Center Expansion/Renovation Project
Memorandum in Support of Notice of Exemption

Project Description

Introduction

San Diego State University (SDSU) proposes to renovate and expand the existing Aztec Recreation Center ("proposed project"). The existing Aztec Recreation Center ("ARC") is 74,000 gross square feet ("GSF") in size and the proposed project would expand the ARC facility to approximately 142,000 GSF. The purpose of the proposed project is to improve and expand student recreation and fitness facilities on campus. The proposed project would include additional indoor sports court space, enhanced food service and meeting spaces, and expanded locker room facilities.

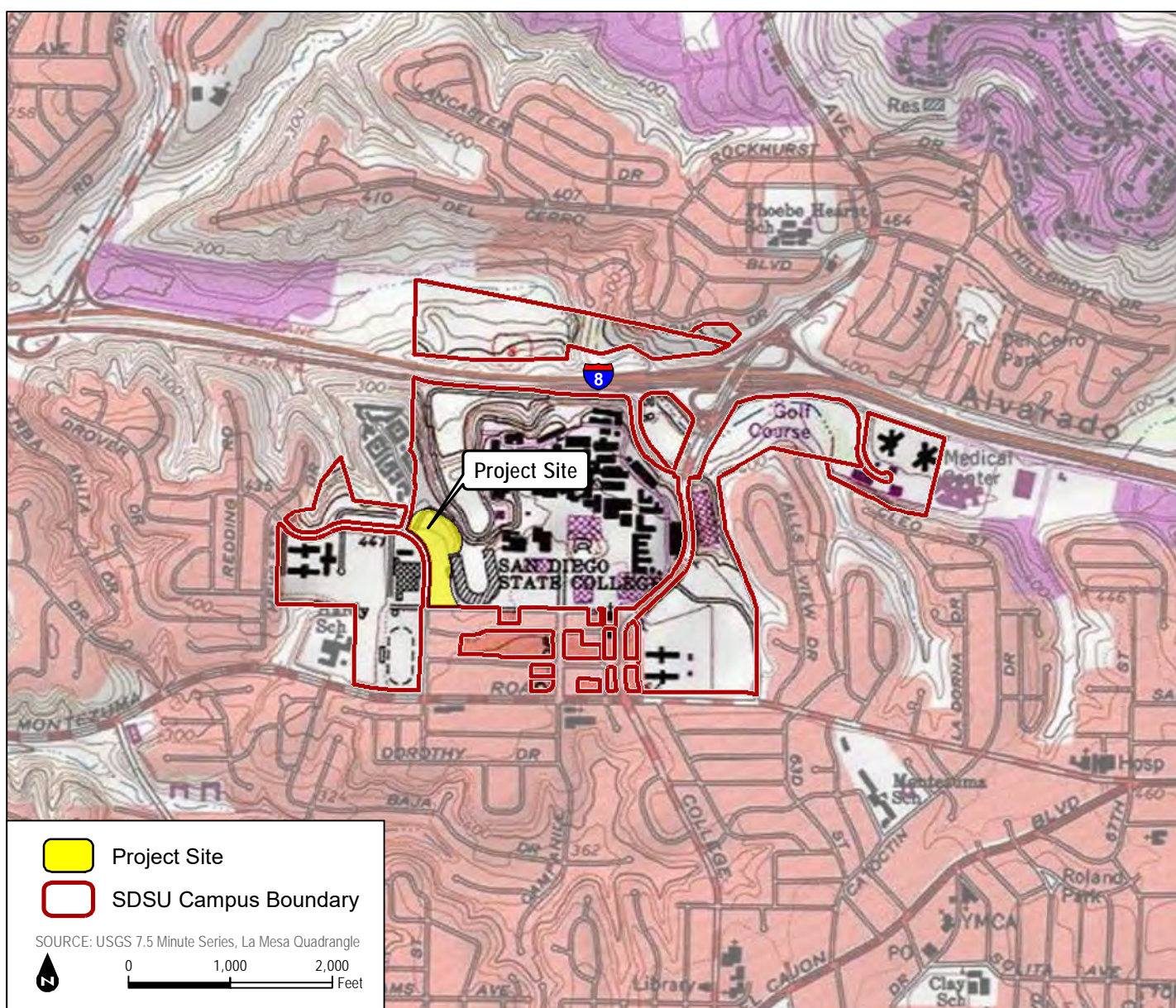
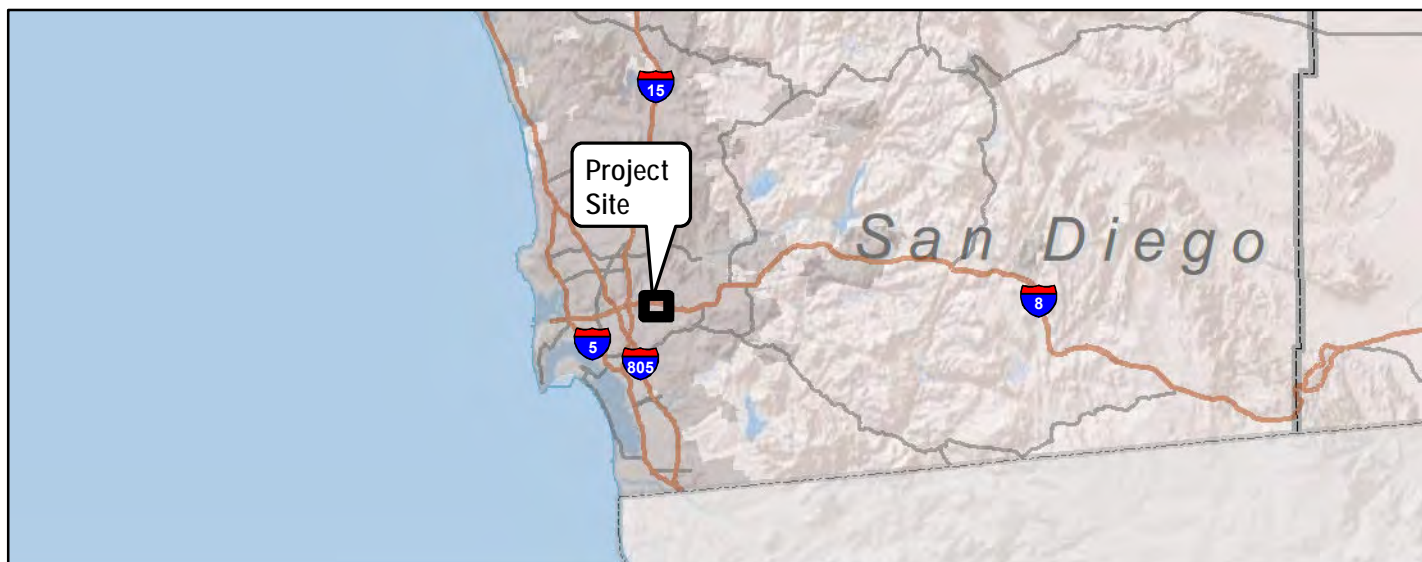
Currently, use of the ARC facilities is by paid membership only. The facility has a current monthly membership of approximately 16,000 people. Of that total, over 95% are SDSU students, faculty, or staff; the remaining 5% are members from outside of SDSU. Starting in fall 2021, SDSU plans to increase the Student Body Center Fee and, as a result, all enrolled students will have access to the facility at no additional fee. The proposed project would not increase student enrollment, though it is expected that the future fee structure and improved facilities would attract increased student use.

Project Location

The proposed project would be located on the site of the existing ARC within the existing Campus Master Plan boundary (Figure 1, Project Location Map). The project site is bounded by 55th Street to the west, Aztec Circle Drive and Parking Structure 12 to the north, the remnants of the Aztec Bowl bleachers and a surface parking lot to the east (Parking Lot 13), Viejas Arena to the southeast, and Aztec Walk to the south (Figure 2, Project Site). The project site totals 4.79 acres, the majority of which are already developed with the existing ARC building, parking area, and driveways.

The SDSU campus is located within the College Area Community Planning Area within the City of San Diego (City) approximately 8 miles east of downtown San Diego. The SDSU campus can be accessed from the north by College Avenue, which also provides local access to Interstate 8, from the south by Montezuma Road, an east–west roadway near the southern boundary of the campus that also connects with Interstate 8.

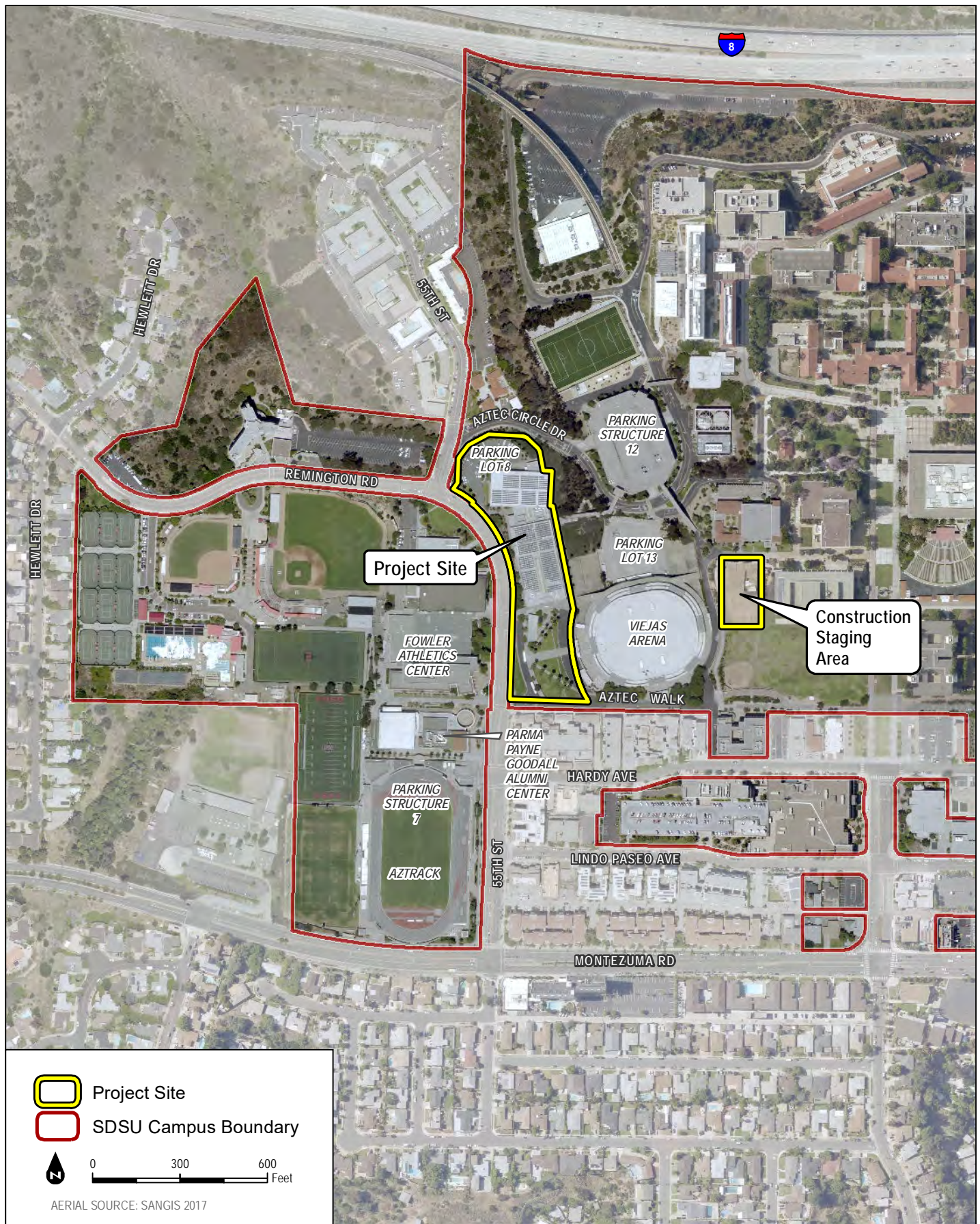
As shown on Figure 2 (Project Site), the ARC site is located in a dense, urban locale surrounded by dense, urban land uses, including: SDSU recreational facilities, surface parking lots, and the University Police building to the west; surface parking lots, the SDSU International Student Center, and multifamily residential uses to the north; surface and structure parking lots to the north and east; Viejas Arena to the southeast; and student multifamily housing to the south. Vehicular access to the ARC is via 55th Street or Aztec Circle Drive, which abut the ARC. Pedestrian routes exist along these existing streets (55th Street and Aztec Circle Drive) and through pedestrian walkways (including Aztec Walk, a sky bridge from Parking Structure 12, and pedestrian walkways in and around Viejas Arena).



SDSU ARC Expansion Project



Figure 1
Project Location



SDSU ARC Expansion Project



**Figure 2
Project Site**

ARC Building

The existing ARC facility is a single-story building consisting of approximately 74,000 GSF. It includes one four-court gym and other single-court gyms, which have been converted into cardio fitness and weight-lifting areas. The proposed project would expand the existing ARC by approximately 68,000 gross square feet over two stories, of which approximately 42,000 square feet would involve the conversion of the gyms currently used as cardio fitness and weight-lifting areas back to their intended use as single-court gyms.

With the proposed expansion, the ARC building would be two stories in height and total 142,000 GSF, along with a courtyard and associated landscaping (Figure 3, Site Plan). On the first level, the proposed project would expand the existing ARC to the south and northwest. The southern expansion would include a classroom pavilion, a terrace café, gender-neutral locker rooms and restrooms, a student lounge, three group fitness rooms, a climbing court, and an open fitness room; the northern expansion would include a multi-activity court gym. On the second level, the expansion would include three group fitness areas, administrative office suite, and an open fitness area enclosed by an indoor running track. Solar panels would be included on the roof of the proposed ARC. New outdoor site lighting would match campus standards, including motion activated multi-level dimming (except along a street), and would reduce light pollution.

Landscaping

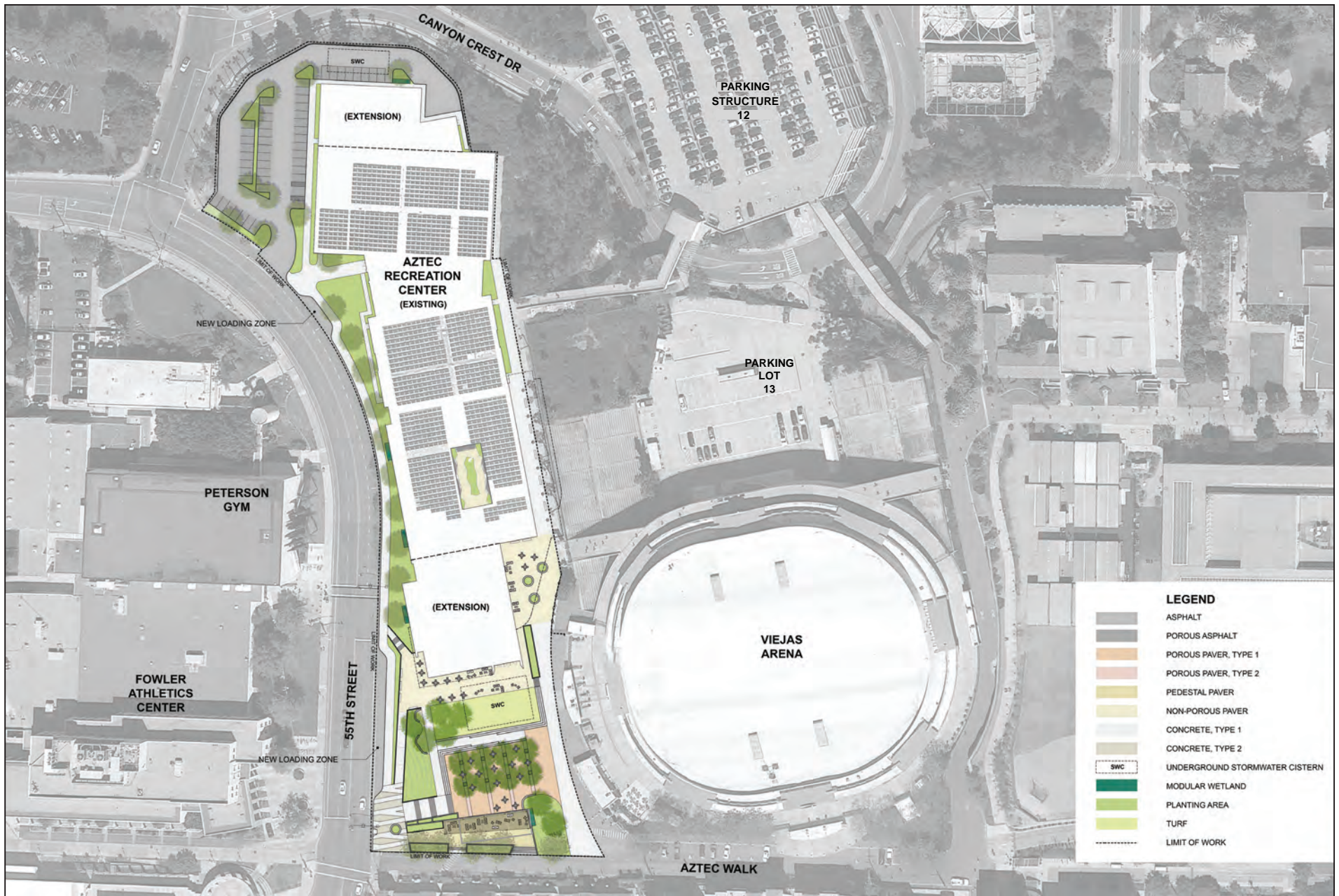
The proposed project would include an outdoor courtyard and plaza space on the southern portion of the site, extending from the ARC to Aztec Walk. Existing palm trees within the plaza would be removed and replaced with larger canopy trees, including deciduous and evergreen trees, which provide more shade than the existing palms. Additionally, a 5,000-square-foot terrace and garden rooms that account for 2,800 square feet are proposed within the plaza. New street trees would also be planted. Landscaping elements incorporate biophilic design elements that balance green space and hardscape and include drought-tolerant plants that reduce heat islands.

Parking, Circulation and Access

Vehicular and emergency access would remain in the current locations, along Aztec Walk to the south and 55th Street to the west. 55th Street would continue to function as a main access point, including emergency access, to the facility. The existing one-way drop-off/pick-up lane, which is currently unused, connecting Aztec Walk and 55th Street would be removed and replaced with a drop-off/pick-up area along 55th Street. This lane would be able to accommodate two buses and two cars at one time. (See Figure 3, Site Plan.)

By removing the one-way drop-off/pick-up lane, the corresponding east leg of the 55th Street / Peterson Gym Intersection would also be removed, though the traffic signal at the intersection would be retained to keep the controlled crossing for pedestrians at 55th Street. To improve pedestrian connectivity in the area, SDSU plans to add a pedestrian crosswalk across 55th Street at the north side of the 55th Street/Aztec Walk intersection. The existing Aztec Walk pedestrian corridor south of Viejas Arena, and across 55th Street immediately west of the ARC, would remain the main east-west corridor within the area. The east-west pedestrian corridor that traverses 55th Street immediately west of the ARC along the northern side of Viejas Arena would remain. (See Figure 3, Site Plan.)

Parking Lot 8, which is located immediately northwest of the existing ARC, would be reconfigured to improve drive aisles; parking capacity would not change as part of the proposed project.



SDSU ARC Expansion Project



Figure 3
Site Plan

Sustainable Design Features

The proposed project would achieve Leadership in Energy and Environmental Design (“LEED”) Platinum certification by implementing sustainable and environmentally friendly design features, techniques, and materials, including:

- Rainwater from roofs would be captured and stored on site for reuse in irrigation systems and process uses.
- Streetlights, plaza lights, and walkway lights would meet campus standards and International Dark-Sky Association standards (a LEED requirement), and would be motion-activated and multi-level where appropriate. Interior building light controls would meet Title 24 and LEED standards for daylight dimming and occupancy sensors.
- Very low-water consumption plumbing fixtures and features such as graywater capture from showers would be installed for outdoor and indoor water use reduction.
- Water submeters would be provided for monitoring and management of building water uses.
- The proposed project would implement salvage and reuse of the existing renewable energy photovoltaic system, to be included on the roof of the proposed ARC. The amount of solar energy will meet the requirements for LEED Platinum standards.
- The proposed heating, ventilation, and air conditioning system would rely on electric space heating and domestic water heating for the facility to reduce use of fossil fuels.
- Durable, low-maintenance, locally sourced materials that require less frequent replacement would be used during construction to improve the life cycle of materials and generate less waste, a prerequisite for LEED Platinum standards.
- Recyclable waste products would be recycled by the construction teams to reduce waste, per requirements of the City of San Diego and SDSU. SDSU would also pursue on-site reuse of materials, where possible.
- Day-lit and naturally ventilated spaces would be used to enhance indoor environmental quality and reduce electricity use, per LEED Platinum requirements.

Proposed Construction Schedule

Construction of the facility would take approximately 16 months and would include six phases. The first phase, lasting approximately 27 working days, would involve partial demolition of approximately 25,000 square feet of the existing ARC and require the use of one concrete industrial saw, one rubber-tired dozer, and three tractors/loaders/backhoes; and require seven tradesmen. A total volume of 6,167 cubic yards of debris would be removed from the ARC site and trucked to a construction and debris recycling facility.

The second phase, lasting approximately 2 days, would consist of site preparation, such as clearing and grubbing. During this phase, Stormwater Pollution Prevention Plan-directed controls would be installed. It would require the use of one grader and one tractor/loader/backhoe; and require seven tradesmen.

The third phase, lasting approximately 4 days, would include grading. This phase would necessitate one concrete industrial saw, one rubber-tired dozer, and one tractor/loader/backhoe; and require a construction crew of approximately four tradesmen.

The fourth phase, lasting approximately 13 months, would consist of building construction. This phase would necessitate 1 crane, 1 forklift, 1 generator, 3 welders, and 1 tractor/loader/backhoe; and require a construction crew of approximately 40 tradesmen.

The fifth phase, lasting approximately 10 days, would include paving. This phase would necessitate one paver, one roller, one cement and mortar mixer, one paving equipment, one tractor/loader/backhoe, and one concrete pump; and require a construction crew of approximately seven tradesmen.

The final phase, lasting approximately 10 days, would include application of architectural coatings, such as stucco and paint. This phase of construction would require the use of one air compressor and three tradesmen.

Construction access would be provided at the corner of Aztec Walk and 55th Street, and along 55th Street. Fencing would be provided during construction along the perimeter of the proposed courtyard area within the southern portion of the site. The proposed equipment staging area would be provided off site to the east of the Viejas Arena at the corner of Aztec Bowl and an unnamed access road (Figure 2). The proposed project would incorporate best management practices during construction to minimize stormwater runoff in compliance with the State Water Resources Control Board's Construction General Permit. The existing ARC would remain open and existing ARC parking would remain accessible during construction.

Categorical Exemptions

As discussed below, the proposed project is exempt from the California Environmental Quality Act (Pub. Resources Code §21000 et seq.) ("CEQA"), pursuant to four exemptions set forth in the CEQA Guidelines (14 CCR §15000 et seq.): (1) Class 32 – In-Fill Development Projects, (2) CEQA Guidelines § 15061(b)(3) – "Common Sense" Exemption, and (3) Class 2 – Replacement or Reconstruction.

Class 32 (CEQA Guidelines § 15332, In-Fill Development)

Under CEQA Guidelines section 15332, In-Fill Development Projects (14 CCR § 15323), projects that meet the following exemplar conditions are characterized as in-fill development, and, therefore, are categorically exempt from CEQA under Class 32:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.

The proposed project meets each of the conditions set forth in CEQA Guidelines section 15332 and, therefore, is exempt from CEQA:

- (a) The proposed project would be consistent with the applicable plan designation and all applicable policies, zoning designations, and regulations.

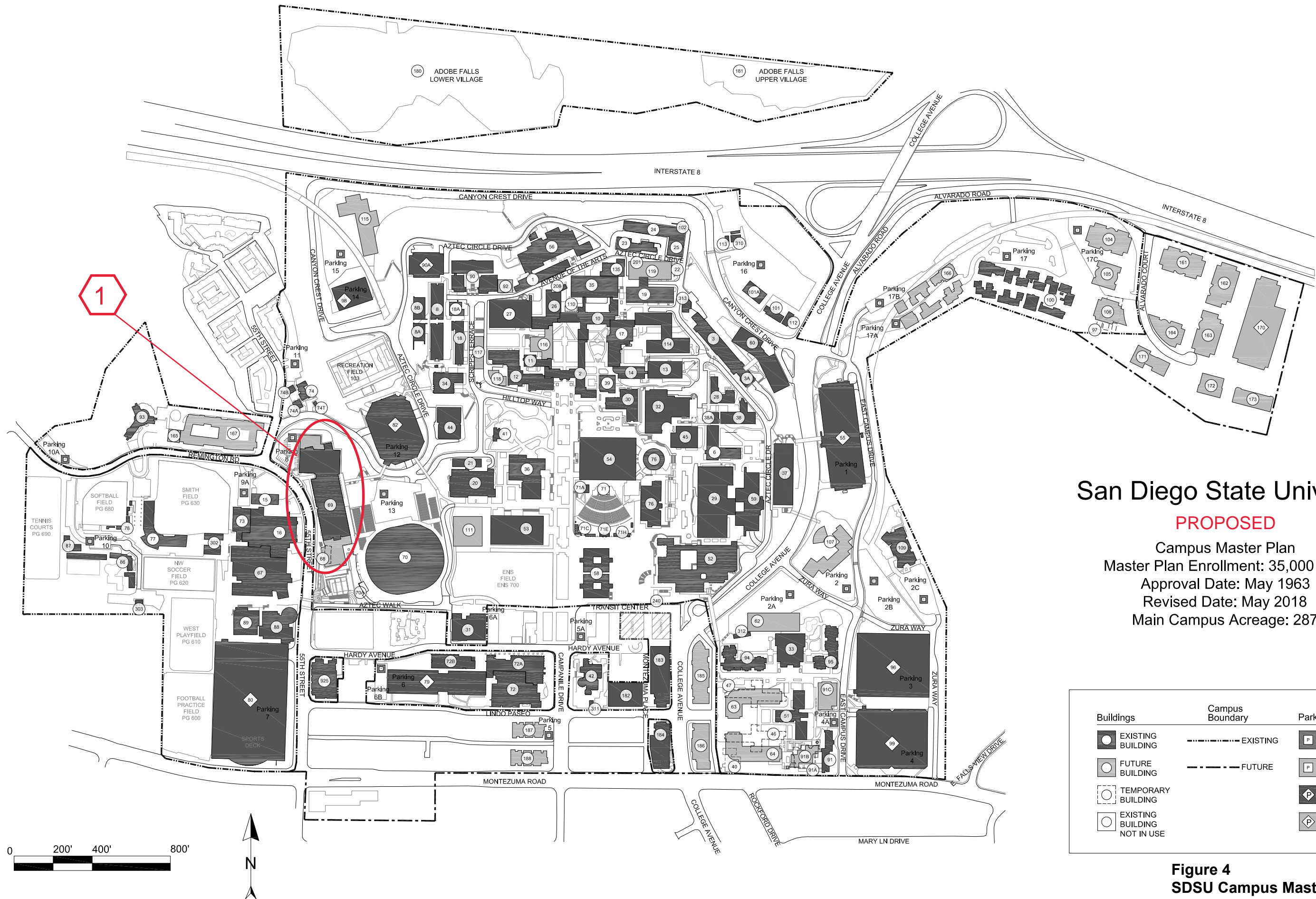
Development of the proposed project site involves renovation and expansion of an existing building located on the SDSU campus. The existing ARC building is included within the current and approved SDSU Campus Master Plan, as shown on Figure 4, SDSU Campus Master Plan; see Building No. 69. The proposed renovation and expansion is consistent with, and does not conflict with, the applicable plan designation for the site (i.e., the SDSU Campus Master Plan designation) as no change in designated use is proposed. Following a minor master plan amendment that would be approved as part of the project, the Campus Master Plan would reflect the expanded footprint as also shown on Figure 4.

- (b) The proposed project would be located within the city limits of the City of San Diego on an approximately 4.7-acre project site of no more than 5 acres in size that is substantially surrounded by urban uses. (See Figure 2, Project Site.)
- (c) The proposed project site has no value as habitat for endangered, rare, or threatened species, as the site is currently developed and consists of an existing building, a parking lot, and paved walkways and gathering areas. The only plants on the site are non-native plants for landscaping; no naturally occurring or native plant species or communities exist on the site, and because of the concentration and types of plants, plants on site do not serve as habitat for wildlife. (See Appendix A.)
- (d) Approval of the proposed project would not result in any significant effects related to traffic, noise, air quality, or water quality. Each is addressed separately below.
 - (i) **Traffic:** The proposed project would not result in either significant construction- or operation- related traffic impacts at any of the study area intersections or segments surrounding the proposed project area. This determination, which is summarized below, is based on the analysis contained in the technical memorandum prepared by Linscott Law and Greenspan, Engineers (LLG) entitled *SDSU Aztec Recreation Center Expansion – Transportation Impact Analysis, November 6, 2018*, attached to this document and incorporated herein by this reference. Potential impacts associated with construction and operations are addressed separately below.

Construction

Project construction and grading would be conducted in a balanced cut/fill operation and, therefore, traffic generation would be minimized and consist primarily of materials delivery, demolition waste haul, and worker commute trips.

As part of all construction operations on campus, SDSU implements traffic control plans (TCP), which serve safety and the effective movement of road uses through or around temporary traffic control zones. Through the TCP, daily construction activities, including materials delivery, demolition waste haul, and worker commute trips, are scheduled to avoid peak commute hours. As a result, construction-related trips would **not result in a significant impact**.



San Diego State University

PROPOSED

Campus Master Plan
 Master Plan Enrollment: 35,000 FTE
 Approval Date: May 1963
 Revised Date: May 2018
 Main Campus Acreage: 287

| Buildings | Campus Boundary | Parking |
|------------------------------|-----------------|--------------------|
| EXISTING BUILDING | EXISTING | EXISTING LOT |
| FUTURE BUILDING | FUTURE | FUTURE LOT |
| TEMPORARY BUILDING | | EXISTING STRUCTURE |
| EXISTING BUILDING NOT IN USE | | FUTURE STRUCTURE |

Figure 4
SDSU Campus Master Plan

Operation

The renovated and expanded ARC facility would be used primarily by students, faculty, and staff already on campus for classes or other events. Currently, approximately 13% of ARC patrons who drove to the ARC were not already on campus for other reasons. As a result, and as explained below, the proposed project would not generate a substantial increase in traffic.

To estimate the increase in vehicle trips generated by the ARC expansion, LLG researched patron growth after similar expansions of facilities at other campuses (CSU San Luis Obispo and the University of Arizona) and surveyed patrons at the existing ARC regarding their modes of transportation. Based on similar expansions of campus recreational facilities, the proposed project is likely to result in a 40% increase in patrons. To be conservative, a 50% increase in patrons was assumed. Based on surveys of patrons to the existing ARC, as noted above, approximately 13% drove to the ARC as their only on-campus destination. To be conservative, a 15% trip generation rate was assumed.

Additionally, the proposed project would add 20 employees. Although the majority (approximately 77%) of current employees are students, who are already on-campus, the analysis added 10 additional daily trips to account for the increase of 20 employees at the ARC. Based on these conservative estimates, the proposed project would add approximately 604 daily trips, which includes 28 AM peak-hour trips, and 44 PM peak-hour trips.

While SDSU as a state agency is not subject to local planning regulations such as the City of San Diego traffic guidelines, both CSU and City thresholds of significance were utilized to evaluate the proposed project's traffic impacts. Under both CSU and City standards, level of service (LOS) D or better is considered acceptable under both direct and cumulative conditions. For an intersection that operates at LOS E without the project, an impact is considered significant if it would result in an increased delay of more than 2 seconds under City standards or 5 seconds under CSU standards. For an intersection that operates at LOS F without the project, an impact is considered significant if it would result in an increased delay of more than 1 second under City standards or would increase the volume to capacity ratio by 0.02 or more under CSU standards. For a road segment that operates at LOS E without the project, an impact is considered significant if it would increase the volume to capacity ratio (V/C) by more than 0.02 under City standards or an increased peak-hour delay of 5 or more seconds under CSU standards. (See Appendix B, pp. 13–15, Table 5-1 (City of San Diego Traffic Impact Significance Thresholds).)

Currently, all study intersections and segments operate at LOS D or better, except the 55th St / Montezuma Rd Intersection (LOS E, with a 59.8 second delay, during the PM peak hour). With the proposed project, all study intersections and segments would operate at the same LOS as under existing conditions; accordingly, no significant impacts would occur to intersections currently operating at an acceptable LOS. The 55th St / Montezuma Rd Intersection would continue to operate at LOS E during the PM peak hour, with a total delay of 60.5 seconds. Because the increased delay (0.7

seconds) is below the applicable threshold level (2 seconds), impacts would **not be significant**.

Cumulative impacts also would be less than significant. A total of forty-five (45) cumulative projects were identified in the area that will add traffic to the roadways surrounding the project site. Accounting for cumulative projects, all study intersections and segments will operate at LOS D or better without the proposed project, except the 55th St / Montezuma Rd, Intersection (LOS F, with a 85.8 second delay, during the PM peak hour) and the Montezuma Road segment from 55th Street to College Avenue (LOS E, with a volume to capacity ratio of 0.907).

With the proposed project, all intersections and segments would operate at the same LOS as under no project conditions. The 55th St / Montezuma Rd Intersection would continue to operate at LOS F, with a total delay of 86.5 seconds. Because the increased delay (0.7 seconds) is below the applicable threshold level (1 second), impacts would *be less than significant*. The Montezuma Road segment from 55th Street to College Avenue would continue to operate at LOS E, with a 0.912 V/C. Because the increase of 0.005 V/C is below the applicable threshold level of 0.02, impacts would *be less than significant*.

Therefore, all study area intersections and segments would continue to operate at the same LOS levels as under no project conditions, and the proposed project would not increase delays or V/C above threshold levels. Impacts are **not significant**.

Further, even though a VMT analysis is not yet required, the Transportation Impact Analysis prepared by LLG assessed VMT and determined impacts would **not be significant** (see Appendix B, p. 39–40.)

Access

Vehicular access to the ARC's parking area would remain the same via a driveway off 55th Street just east of the 55th Street / Remington Road intersection.

As discussed above and shown on the Site Plan (See Figure 3), the proposed project would remove the existing Viejas Arena one-way drop-off/pick-up lane on the west side of the site parallel to 55th Street and provide a new drop-off/pick-up lane on the east side of 55th Street. The new drop-off/pick-up area would keep traffic flow on 55th Street unimpeded, and the total vehicle stacking capacity would be the same as the existing drop-off/pick-up lane. Therefore, **no significant impacts** would occur.

With respect to emergency response times, the proposed project would increase vehicle traffic nominally in the vicinity of SDSU. These nominal traffic increases would not increase emergency response times for two reasons. First, emergency response vehicles have the right-of-way and are exempted from rules of the road in emergency situations. If required, drivers of emergency vehicles are trained to utilize center turn lanes, or travel in opposing through lanes to pass through crowded intersections. Second, the 4-lane roadway configuration of 55th Street has adequate right-of-way for emergency vehicles to maneuver around traffic, even under congested conditions. Therefore, the proposed project would **not result in significant impacts** to emergency access.

Pedestrian, Bicycle, and Transit

The proposed project would expand the ARC to the south. Accordingly, the existing pedestrian corridor in the east-west direction north of the Viejas Arena would be rerouted around the expanded ARC building. Additionally, the east leg of the 55th Street / Peterson Gym intersection would be removed with the removal of the existing drop-off/pick-up lane. (See Figure 3, Site Plan.) However, the traffic signal would remain in place as a controlled crossing for pedestrians crossing 55th Street. The Project also would provide an additional crosswalk across the 55th Street / Aztec Walk intersection on the north end, which would improve pedestrian circulation. Further, bike lanes are currently provided, and would remain, along 55th Street between Montezuma Road and Remington Road. Aztec Walk is currently designated as an on-campus east west bike route and will remain that way. Excellent pedestrian and bike access is provided to this area of the campus, and the proposed project would generally retain the same access routes.

Regarding transit, most ARC patrons are already on campus for educational or social reasons and, therefore, do not travel specifically to use the ARC. Moreover, based on typical mode splits (i.e., the percentage of travelers using vehicles as compared to transit), the proposed project is anticipated to generate a very small number of additional transit passengers during the critical AM/PM peak travel periods, when transit is most heavily utilized. As discussed above, the proposed project would generate a relatively small number of total trips.

Therefore, impacts related to pedestrians, bicyclists, and transit would **not be significant**.

- (ii) Noise: The proposed project would not result in significant construction- or operation-related noise impacts. This conclusion, and the summary analysis that follows, is based on the technical memorandum prepared by Dudek entitled *SDSU ARC Expansion Project – Noise Technical Memorandum* (November 20, 2018), included as Appendix C and incorporated herein by this reference. Potential impacts associated with construction and operations are addressed separately below.

Construction-Related Noise

The nearest noise-sensitive land use to the project site is the multifamily housing located on the western side of 55th Street at Canyon Crest Drive, approximately 200 feet from the northern project boundary. However, construction activities to the south of the existing ARC (the expansion of the ARC to the south) would take place approximately 850 feet from the nearest residential use. Given the general location of construction activities within the project site, construction noise would typically occur approximately 400 feet from noise-sensitive land uses.

The highest construction noise levels would occur during demolition activities when noise levels would be as high as 72 dBA equivalent continuous sound level (Leq 12-hr) at the nearest existing residences approximately 200 feet away. At the more typical distances of 400 or more feet, construction noise would range from approximately 54 to 66 dBA Leq. The demolition phase of project construction would last for approximately 27 days.

As a result, at the nearest noise-sensitive (multifamily residential) land uses, peak noise levels during temporary construction-related activities would be below the City of San Diego's 75-dBA 12-hour average noise level criterion. Because noise during demolition and construction activities would be temporary and would be below city thresholds, impacts would be **not be significant**.

As to vibration-related construction impacts, the heaviest pieces of construction equipment that could be used during project construction include bulldozers, graders, loaded trucks, water trucks, pavers, and cranes. Project construction would involve no blasting or pile driving. Continuous vibrations with a peak particle velocity of approximately 0.1 inches/second begin to annoy people. Groundborne vibration from the heavy equipment is typically attenuated over short distances (i.e., within 25 to 50 feet). The nearest off-site land uses would be located approximately 200 or more feet to the north during construction of the northern portion of the project site. At this distance, groundborne vibration levels during project construction would be approximately 0.004 inches/second and, therefore, well below the threshold of annoyance. Therefore, potential vibration-related impacts would **not be significant**.

From a cumulative impacts perspective, construction noise impacts primarily affect the areas immediately adjacent to the proposed project site. Although construction activities may occur simultaneously at several areas on the SDSU campus and in the surrounding community, simultaneous construction would not occur in the immediate area of the proposed project and, as a result, the increased noise would **not result in significant cumulative impacts**.

Operation-Related Noise

The proposed project would renovate and expand an existing recreational center and, therefore, would not introduce new land uses to the area. Rather, the expansion of the existing ARC would generate an increase in the number of patrons to the ARC. Additional vehicle trips to the ARC are anticipated to result in a maximum 1 dB CNEL noise increase at one nearby noise receptor, which is neither a perceptible noise increase nor a significant impact; no vehicle trip-related noise increases would occur at other nearby sensitive receptor locations.

The expansion would also add rooftop mechanical equipment (such as HVAC equipment). The HVAC equipment would not have condenser units, and instead would connect to the campus chilled-water system. The noise levels generated by this equipment would typically range from approximately 45 to 55 dBA at a distance of 50 feet. The equipment would be centrally located toward the south of the site. At the nearest noise-sensitive land uses, approximately 450 to 500 feet to the north of the rooftop equipment, the noise levels from this equipment would be approximately 26 to 36 dBA. These levels are below the City of San Diego's Noise Ordinance standard for multifamily residences of 55 dBA during the daytime hours (7:00 a.m. to 7:00 p.m.), 50 dBA during the evening hours (7:00 p.m. to 10:00 p.m.), and 45 dBA during the nighttime hours (10:00 p.m. to 7:00 a.m.).

Regarding other mechanical equipment, SDSU is considering installation of a backup power generator, which would only be used during an emergency power outage and routine testing. If installed, noise from the emergency generator would be exempt from

local noise standards. Nevertheless, noise from the generator would be less than 55 dBA even when in operation.

In summary, no operational noise impacts would result from the proposed project and, therefore, impacts would **not be significant**.

- (iii) *Air Quality:* The proposed project would not result in significant construction- or operation- related air quality impacts. The following summary analysis is based on the technical memorandum prepared by Dudek entitled *SDSU ARC Expansion Project Air Quality Technical Memorandum* (October 15, 2018). The technical memorandum is included in its entirety as Appendix D and is incorporated herein by this reference.

While CSU/SDSU, as a state agency, is not subject to local land use plans, for the limited purpose of this analysis, the San Diego Air Pollution Control District (SDAPCD) thresholds (including State Implementation Plan (SIP) and Regional Air Quality Strategy (RAQS)) and the San Diego Association of Governments (SANDAG) growth predictions were utilized to assess the proposed project's consistency with the applicable air quality plan. In this regard, the proposed project would result in an increase of approximately 20 employees, which is a conservative estimate in assessing consistency because most of these jobs would be part-time positions filled by students already on campus. In any event, this increase in local employment and associated vehicle source emissions would not exceed the growth projections of the RAQS, as the additional 20 jobs is within the projected annual increase of 4,420 jobs per year. Therefore, the proposed project would be consistent with the SANDAG growth forecasts in the RAQS. Impacts would not be significant. Potential impacts associated with construction and operation of the proposed project are addressed separately below.

Construction Emissions

Construction of the proposed project would result in temporary emissions of volatile organic compounds (VOCs), nitrogen oxide (NO_x), carbon monoxide (CO), and particulate matter (PM₁₀ and PM_{2.5}) emissions from internal combustion engines used by construction equipment, trucks, and worker vehicles. PM₁₀ and PM_{2.5} emissions would also be generated by entrained dust, which results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil.

Construction of the proposed project would be required to comply with SDAPCD Rule 55 to control dust emissions generated during any dust-generating activities. Standard construction practices would be employed that also reduce fugitive dust emissions, such as watering of the active dust areas two times per day depending on weather conditions.

As such, emissions from project construction would not exceed SDAPCD's daily thresholds. As shown in Table 5 of Appendix D, emissions would be well below SDAPCD thresholds for all air pollutants. Therefore, construction impacts associated with criteria air pollutant emissions would not be significant.

As to toxic air contaminants (TAC), the greatest potential for TAC emissions during construction would be diesel particulate matter (DPM) emissions from heavy equipment operations and heavy-duty trucks. (The TAC emissions during operation from the emergency generator and natural gas combustion would be infrequent and would pose

no risk to nearby sensitive receptors.) The closest sensitive receptors would be the existing residents south of Aztec Walk approximately 800 feet away.

Health effects from carcinogenic air toxics are typically described in terms of cancer risk. SDAPCD recommends an incremental cancer risk threshold of 10 in a million and a Chronic Hazard Index significance threshold of 1.0, meaning that adverse health effects are not expected.

Construction of project components would require use of heavy-duty construction equipment, which would occur over a 16-month period and would be periodic and short term in nature. Maximum emissions during this period would not exceed health thresholds (see Appendix D, Table 10, Summary of Maximum Cancer and Chronic Health Risks).

Further, construction and operation of the proposed would not result in significant emissions of any criteria air pollutants. The existing NO₂ concentrations in the area are well below the NAAQS and CAAQS standards, and the proposed project's NO_x emissions would not contribute to health effects. The impacts related to CO hotspots were discussed previously and are well below thresholds.

Therefore, the exposure of project-related TAC and criteria pollutant emission impacts to sensitive receptors would be **not be significant**.

Operational Emissions

The proposed project would result in increased criteria pollutant emissions from area, mobile, and stationary sources due to the expansion of the existing recreation center. However, operational emissions would be well below the SDAPCD's daily significance thresholds (see Appendix D, Table 6, Estimated Maximum Daily Operational Criteria Air Pollutant Emissions) and well below SDAPCD's yearly significance thresholds (see Appendix D, Table 7, Estimated Annual Operational Criteria Air Pollutants Emissions). Overall, emissions would be nominal compared to the applicable significance thresholds (i.e., 0.58 yearly tons compared to the 13.7-ton threshold for VOC, 0.64 compared to the 40-ton threshold for NO_x, 1.9 compared to 100-ton threshold for CO, 0.01 compared to the 40-ton threshold for SO_x, 0.37 compared to the 15-ton threshold for PM₁₀, and 0.1 compared to the 10-ton threshold of PM_{2.5}). Therefore, operational emissions would **not be significant**.

Sensitive Receptors – Carbon Monoxide (CO Hotspots)

Mobile-source emissions associated with traffic can result in the formation of CO hotspots. Construction of the proposed project would not emit CO in quantities that could pose health concerns, as construction would generate temporary and negligible CO emissions (i.e., a maximum of 21.24 pounds per day compared to the threshold amount of 550 pounds per day) (see Appendix D, Table 5). Similarly, operational emissions would generate negligible CO emissions (i.e., 16.66 pounds per day compared to the threshold of 550 pounds per day).

The City of San Diego's Significance Determination Thresholds CO hotspot screening guidance recommends a quantitative analysis of CO hotspots if a roadway would operate at LOS D or worse and is within 400 feet of a sensitive receptor. One intersection meets this criterion (55th Street and Montezuma Road during AM and

PM peak hours). CO concentrations were modeled at four receptor locations, on the sidewalk at each corner of the intersection at a height of 5.9 feet, to assess the maximum potential CO exposure that could occur in 2021. The maximum CO concentration for the 1-hour averaging period would be 3.0 ppm, which is well below threshold of 20 ppm. The maximum CO concentration for the predicted 8-hour period would be 2.1 ppm, which is well below the threshold of 9.0 ppm.

As a result, exposure of sensitive receptors to CO would **not be significant**.

- (iv) Water Quality: The proposed project would not result in significant construction- or operation-related water quality impacts. This conclusion, and the summary analysis that follows, is based on the technical memorandum prepared by Dudek entitled *SDSU ARC Expansion Project – Water Quality Technical Memorandum* (November 20, 2018), included as Appendix E and incorporated herein by this reference. The proposed project would not result in either significant construction- or operation- related water quality impacts. The proposed project would be constructed on a currently developed site in an urban area on the SDSU campus. Potential impacts associated with construction and operation of the proposed project are addressed separately below.

Construction Impacts

Runoff from construction-related activities would generally be limited to activities during the initial demolition of a portion of the existing ARC and site-preparation phases of construction. Contributions of sediment from construction and construction-related pollutants would be minor and not measurable in the context of the watershed as a whole. The prevailing standard is nevertheless to reduce pollutant contributions to the maximum extent practicable regardless of how minor the sediment contribution might be. The Stormwater pollution prevention plan (SWPPP) prepared for the project would incorporate effective best management practices (BMPs), consistent with the Construction General Permit (SWRCB Order No. 2009-0009-DWQ), including silt fences installed along limits of work and the project construction site, stockpile containment (e.g., Visqueen, fiber rolls, gravel bags), exposed soil stabilization structures (e.g., fiber matrix on slopes and construction access stabilization mechanisms), and street sweeping. As such, impacts related to stormwater runoff during construction activities would **not be significant**.

Water applied for dust control purposes during construction would be in sufficient quantities only to wet the soil, which would not produce runoff from the construction site because it would either quickly evaporate or locally infiltrate into shallow surface soils. Because the amount of water applied for dust control would be minimal and no result in oversaturation, it would not result in appreciable effects on groundwater or surface water features.

Operations Impacts

Development of the proposed project would result in a slight increase in impermeable surfaces; these include new concrete walkways, landscaping, permeable pavers, and an asphalt-concrete parking lot. However, the site is currently developed and largely covered in impermeable surfaces. Moreover, the expansion project would include a new storm drain system to replace some existing pipes that would convey both on-site and

off-site runoff; this new system would improve runoff conditions. As a result, impacts, if any, relating to alteration of the existing drainage pattern of the site would not be significant.

Lastly, project operations would involve no non-stormwater discharges to the storm drain system, so stormwater flow would occur only during and immediately after rainfall events. Nonetheless, the proposed project includes improved storm drain systems, as described above, which include detention facilities at the site. As a result, the proposed project would reduce peak discharge in the 100-year storm event from 25 cubic feet per second (current conditions) to 6.58 cubic feet per second.

Therefore, impacts, if any, to water quality would **not be significant**.

- (e) The site of the proposed project can be adequately served by all required utilities and public services. Because the proposed project does not include an increase in student enrollment, or faculty/staff, the proposed project would not increase the demand for campus, school, park, or library resources.

As to fire services, only one ARC-related fire call was recorded over the past two school years. Conservatively, even assuming one additional call per year, this would not impact response times or capacity. As to law enforcement, the University Police Department (UPD) responds to calls originating from the ARC. From the existing ARC, there were 183 UPD service calls during the 2016/2017 year and 121 UPD services calls during the 2017/2018 year. UPD service calls include non-urgent requests and reports of minor or less serious crimes. Based on these prior numbers of UPD service calls, the expansion is expected to add approximately 140 total UPD calls per year. This increase has no potential to substantially increase the UPD's current and acceptable response times. Similarly, emergency medical calls would increase only minimally by about 24 calls per year, which would have **no impact** on service.

As to water supply, the proposed project would generate an increased demand of 5,687,320 gallons per year compared to the existing ARC, which is well within supply and demand projections and infrastructure capacity. As to wastewater, the proposed project would generate 8,815 gallons of wastewater per day, representing 0.005% of the wastewater currently treated at the Point Loma Wastewater Treatment Plant. As to solid waste, an additional 388 tons of solid waste would be generated, and current regional solid waste disposal facilities are expected to have sufficient permitted capacity to serve the proposed project's solid waste generation through buildout.

Therefore, the additional demands of the proposed project expansion **would be adequately serviced** by all required utilities and public services.

"Common Sense" Exemption (CEQA Guidelines § 15061(b)(3))

Under CEQA Guidelines section 15061(b)(3), activities are exempt from, and otherwise not subject to, CEQA under the "common sense" exemption where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment. The proposed project is the expansion and renovation of an existing campus facility, the ARC, which is located on a previously developed site within the SDSU main campus. Under circumstances as these, it can be seen with certainty that there is no possibility that the proposed project may cause a significant environmental impact. Further, technical reports prepared for the

proposed project, included as Exhibits and incorporated herein by this reference, demonstrate that there is no possibility that construction or operation of the proposed project would result in a significant effect on the environment. (See discussion under Class 32 for a summary of these technical reports addressing biology, traffic, air quality, water quality, and public services.)

Class 2 (CEQA Guidelines § 15302, Replacement or Reconstruction)

Under CEQA Guidelines section 15302 (Class 2 - Replacement or Reconstruction), the replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced, are categorically exempt from CEQA. Such replacement or reconstruction projects include, but are not limited to:

- (a) Replacement or reconstruction of existing schools and hospitals to provide earthquake resistant structures which do not increase capacity more than 50 percent.
- (b) Replacement of a commercial structure with a new structure of substantially the same size, purpose, and capacity.
- (c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.
- (d) Conversion of overhead electric utility distribution system facilities to underground including connection to existing overhead electric utility distribution lines where the surface is restored to the condition existing prior to the undergrounding.

The proposed project consists of partial demolition and replacement of the existing ARC, renovation of the existing ARC, and expansion of the existing ARC. In addition to the Class 32 exemption discussed above, the demolition, replacement, and renovation of the existing ARC satisfies the criteria of CEQA Guidelines section 15302 and, therefore, is separately and additionally exempt from CEQA pursuant to the Class 2 exemption.

The existing ARC building is a single-story building of approximately 74,000 square feet. The proposed project would renovate, replace, or reconstruct the existing ARC, including demolition and replacement of approximately 25,000 square feet. The replacement portion of the existing ARC building would be substantially the same size, purpose, and capacity at 25,000 square feet of recreation-related campus space. Additionally, corresponding portions of the ARC utility systems would be replaced with negligible capacity expansion. The renovated and expanded ARC would be located on the same project site, which would continue to serve the same purpose as an on-campus fitness and recreation facility primarily serving students, faculty, and staff at SDSU.

Accordingly, the renovation, replacement, and reconstruction of the existing ARC building is additionally exempt from CEQA pursuant to CEQA Guidelines section 15302.

"Unusual Circumstances" Exception (CEQA Guidelines § 15300.2(c))

Under CEQA Guidelines section 15300.2(c) (Exceptions), a categorical exemption shall not be used where there is a reasonable possibility that the activity will have a significant effect on the environment due to "unusual circumstances." In this case, there are no unusual circumstances related to the proposed project or the project site. The proposed project: is located on a currently developed site with no unusual characteristics; is surrounded by similar types of development within SDSU main campus; would result in no change of use of the site; and, does not involve unusual construction activities. Further, as discussed above, there is no reasonable possibility that

the activity will have a significant effect on the environment. The information provided in this document and in the attached technical reports, along with the nature and location of the proposed project, demonstrate that there are no unusual circumstances surrounding the proposed project that would suggest a reasonable possibility of a significant effect. Therefore, the “unusual circumstances” exception does not apply and does not preclude application of the above categorical exemptions.

Historic Resources Exception (CEQA Guidelines § 15300.2(f))

Under CEQA Guidelines section 15300.2(f), a categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource. The proposed project would not cause a substantial adverse change in the significance of a historical resource as it would result in neither significant construction- nor operation- impacts related to historical resources. This conclusion is based on the technical memorandum prepared by Dudek entitled *SDSU ARC Expansion Project Historical Resources Technical Memorandum* (November 20, 2018), attached as Appendix G and incorporated herein by this reference.

The California Register of Historical Resources (CRHR) protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the National Register of Historic Places (NRHP), and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following criteria: (1) Associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; (2) Associated with the lives of persons important in California’s past; (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (4) Yielded, or may be likely to yield, information important in prehistory or history.

On-Site Structures

The proposed project involves two extensions of the existing ARC: one to the north elevation and one to the south elevation. The south extension would necessitate demolition of the Arena Meeting Center. The Arena Meeting Center is a small building formerly known as the Ticket Building. Both the Arena Meeting Center and the ARC were designed in 1997. Neither building is listed or designated as a historical resource; neither building satisfies a City of San Diego or CRHR criterion for designation. Therefore, the proposed project does not involve physical impacts to any potentially historic resource and impacts would **not be significant**.

Off-Site Structures

The Aztec Bowl is situated to the east of and adjacent to the existing ARC. The Aztec Bowl was completed in 1936 with 5,000 seats. The only expansion to the original design was the addition of 5,000 seats in 1948. On June 6, 1963, President John F. Kennedy gave the SDSU commencement address and received the first-ever honorary doctorate granted by the California State College system. In 1967, the SDSU Aztecs football team moved from the Aztec Bowl to Jack Murphy Stadium (now SDCCU Stadium) upon its completion.

In 1994, the Aztec Bowl was listed in the NRHP. By 1996 construction begun on a new sports arena, known as the Viejas Arena, sited within the southern half of the original Aztec Bowl. As a result, the Aztec Bowl had no further use, fell into disrepair, and was partially demolished. Accordingly, it was officially delisted from the NRHP on May 30, 2012, though it remains listed on the CRHR for its association with President John F. Kennedy.

The Exercise and Nutritional Sciences building is located east of the Aztec Bowl, and north of the planned construction staging area for the proposed project. The building was completed in 1933, and is one of 12 buildings included within the San Diego State College Historic District. It is not listed on the NHRP or CRHR.

Neither the remaining portions of the Aztec Bowl nor the Exercise and Nutritional Sciences building is located within the project footprint, and the proposed project does not involve any alterations or changes to these structures. Nevertheless, as part of its best construction practices, SDSU will demarcate the boundaries of the project area to prevent any possible accidental disruption or damage. Given that the structures are not within the project footprint or construction area of the expansion project, no impacts to these structures are expected. As previously noted, no building in the vicinity is listed on the NRHP and the historic value of the Aztec Bowl has been diminished. Therefore, impacts to off-site structures are **not significant**.

Therefore, the historical resources exception does not apply and does not preclude application of the above categorical exemptions. Further, no other exceptions to the above exemption have any possible application to the proposed project. Accordingly, the proposed project is exempt from CEQA pursuant to the above-cited categorical exemptions.

Appendices

- Appendix A Dudek – SDSU ARC Expansion Project – Biological Resources Technical Memorandum, November 20, 2018
- Appendix B Linscott Law & Greenspan (LLG), Traffic Engineers – SDSU Aztec Recreation Center Expansion – Transportation Impact Analysis, November 6, 2016
- Appendix C Dudek – SDSU ARC Expansion Project – Noise Technical Memorandum, November 20, 2018
- Appendix D Dudek – SDSU ARC Expansion Project – Air Quality Technical Memorandum, October 15, 2018
- Appendix E Dudek – SDSU ARC Expansion Project – Water Quality Technical Memorandum, November 20, 2018
- Appendix F Dudek – SDSU ARC Expansion Project – Public Utilities and Services Technical Memorandum, November 20, 2018
- Appendix G Dudek – SDSU ARC Expansion Project – Historical Resources Technical Memorandum, November 20, 2018