

**San Diego State University
Tula Pavilion and Tenochca Hall Renewal/Refresh Project
Notice of Exemption
Additional Documentation**

Project Description

Introduction

San Diego State University (SDSU) proposes to remove the existing two-story Tula/Tenochca Community Center and construct in its place the Tenochca Community Space and nearby Tula Pavilion ("proposed project"). The proposed Tenochca Community Space would be constructed on the site of the existing Tula/Tenochca Community Center, and the proposed Tula Pavilion would be constructed to the northwest, on the site of a paved walking path at the north end of a service vehicle parking lot. (See Figure 2, Proposed Project Site.) The overarching purpose of the proposed project is to decouple student spaces from public spaces on the SDSU campus and, as a result, better serve SDSU's students, staff, and visitors. The existing Tula/Tenochca Community Center incorporates both public conference spaces and student services spaces. The proposed project will separate these uses, with the proposed Tenochca Community Center housing student services and related spaces, and Tula Pavilion housing public gathering and conference room spaces. By replacing the Tula/Tenochca Community Center with separate buildings, SDSU would provide improved security and better access to shared outdoor amenities for students in the Tenochca Residence Hall, away from publicly-accessible conference spaces.

As the new buildings would merely replace an existing building and its associated uses, the proposed project would not generate new or additional students, staff, or visitors to the SDSU campus. Existing campus infrastructure and available public services would provide adequate support for the new buildings. To facilitate development of the proposed project, SDSU would process a minor master plan amendment to its current campus master plan.

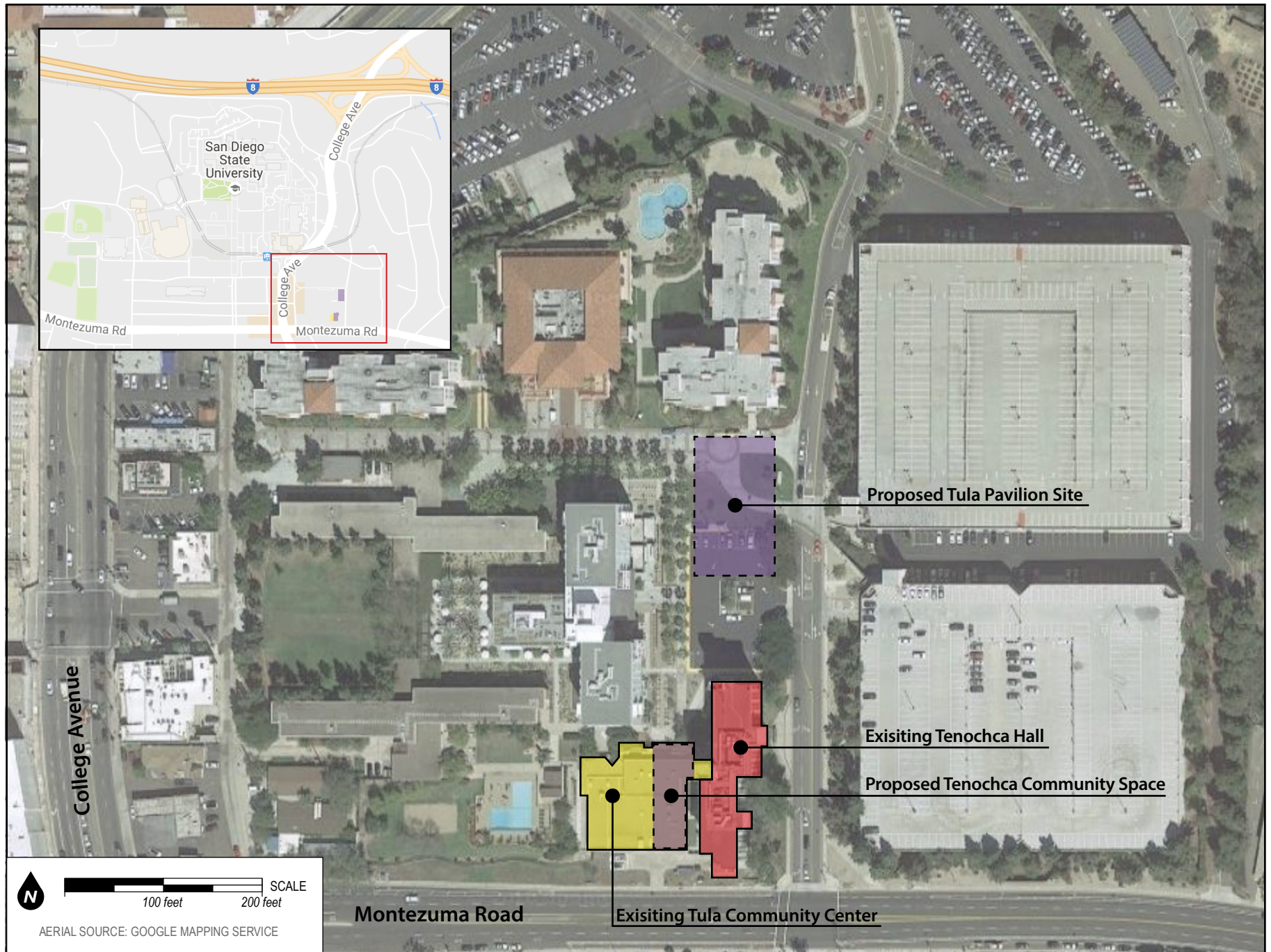
SDSU is located in the College Area, within the City of San Diego, County of San Diego, 10 miles from downtown San Diego. As shown on Figure 1, the site of the proposed project is the southeasterly portion of the main campus, surrounded by urban uses, including commercial and institutional facilities.

Each of the project components and additional details regarding the existing structures and proposed development are separately described below.

Existing Tula/Tenochca Community Center

The existing Tula/Tenochca Community Center building is located on the corner of Montezuma Road and East Campus Drive, in the south-southeast portion of the campus, in the area west of Parking Structures 3 and 4. The area surrounding the site is developed, primarily with academic, recreational, and residential land uses. Other SDSU residence halls are located to the north and west of the site. These residence halls vary in height from three to eight stories.

The existing building is a two-story structure that is approximately 20,000 gross square feet (gsf) in size. The first floor of the existing building serves two disparate functions: an event and conference center primarily for campus events, lectures and classes, and community space for the attached Tenochca Residence Hall. The conference center functions include an assembly hall, a break out room, a small warming kitchen, storage for tables and chairs, and public restrooms. A central check-in desk in the first-floor lobby of the building serves as the security checkpoint for



the attached Tenochca Residence Hall and other amenities. Amenities for the residence hall include meeting rooms, lounges, a tutoring center, mail room, laundry and the front desk. The second floor of the building houses faculty apartments associated with living and learning programs located in the residence hall.

As part of the proposed project, the Tula/Tenochca Community Center would be removed. To replace the demolished building, SDSU proposes to construct the Tula Pavilion and the Tenochca Community Space.

Proposed Tenochca Community Space

The proposed Tenochca Community Space would be constructed at the site of the existing Tula/Tenochca Community Center and would replace the student common spaces at the existing building, such as the security check-in point, student lounge space, laundry, and faculty residences. The proposed Tenochca Community Space would be two-stories in height and approximately 13,000 gsf in size, which is approximately 7,000 gsf smaller than the existing space.

The proposed Tenochca Community Space would include a newly designed entry lobby that would provide a visible and direct path to the security desk. The front desk would provide a student and visitor security point and would allow for increased oversight for entry into the residence hall and student commons area. The main entry desk would accommodate security, a check-in station, student mailroom, and concierge services. The proposed building also would provide a variety of student gathering spaces, ranging from student lounges, a kitchen for student use, and areas visible to televisions that front the outdoor grounds.

Exterior landscape improvements would include the expansion of the landscape at the commons side of the building. A new "Tenochca Backyard" would be created with outdoor room and lawn areas. The outdoor room would contain specialty paving lined with café tables, chairs, and outdoor sofas to provide additional seating options. Appropriate exterior lighting, comparable to the lighting in the area, also would be installed. The existing pool between the proposed Tenochca Community Space and existing Maya Hall would be enclosed with new fencing and furnished with new furniture and tables to create a sense of place at the pool deck surrounded by new palm trees. The grade differential between the main entry and pool level would be accommodated within the building through stairs and elevator access to building levels. No further renovations to the pool area would be proposed as part of the project. Construction of the proposed Tenochca Community Space would require approximately 8,700 square feet of concrete and approximately 850 cubic yards (cy) of structural fill. The Tenochca Community Space would utilize existing services and utilities.

Proposed Tula Pavilion

The proposed Tula Pavilion would replace those spaces that serve public gathering and large assembly functions at the existing Tula/Tenochca Community Center and would be constructed north of the existing building on a portion of a site presently designated as Lot 4A and a portion of a paved walking path. Lot 4A presently serves as short-term parking, visitor parking, and vendor/delivery/service parking. The proposed Tula Pavilion would be a one-story building and would be approximately 12,000 gsf in size.

The proposed Tula Pavilion's interior space would include one large assembly space that can be divided into three smaller rooms to serve as meeting and banquet room(s) as well as pre-function space and a small, separate conference room. Rooms for storage, mechanical, and custodial needs would be provided, as well as restrooms and a catering kitchen.

The proposed building also would incorporate approximately 6,000 square feet of exterior elements, including a courtyard on the north end, and an open arcade that wraps around the west side of the building. The courtyard would provide an outdoor venue for private events, and otherwise would be open to public use and circulation. The open arcade would provide an interior-exterior feel, and would serve as a secondary path between the courtyard and the interior assembly space.

Construction would require approximately 10,000 square feet of concrete and approximately 2,000 cy of backfill. The proposed Tula Pavilion would tie into existing services and utilities. Appropriate exterior lighting, comparable to the lighting in the area, also would be installed.

Proposed Schedule and Summary of Project Details

The anticipated start date for demolition of the Tula/Tenochca Community Center and construction of the proposed Tula Pavilion and Tenochca Community Space is June 2017, with an anticipated construction duration of 15 months.

The total gsf to be removed is approximately 20,000 gsf. Demolition of the existing building and haul away of materials would take approximately one month (i.e., approximately 20 work days). Removal and haul away of materials would require approximately 20 workers. Approximately 4,000 cy of debris volume would be generated during demolition. Hauling of materials during the construction phase principally would utilize the Montezuma/Fairmount route to access Interstate 8 because this route is generally less-congested than College Avenue to I-8 and better accommodates truck traffic.

The total gsf to be constructed is approximately 25,000 gsf of interior space. Table 1 provides additional project details.

Table 1
Tula Pavilion and Tenochca Hall Renewal/Refresh Project Details

	Existing Tula/Tenochca Community Center	Proposed Tenochca Community Space	Proposed Tula Pavilion
Building Gross Square Feet	19,872	12,638	12,181*
Stories	2 stories	2 stories	1 story

Table 1
Tula Pavilion and Tenochca Hall Renewal/Refresh Project Details

	Existing Tula/Tenochca Community Center	Proposed Tenochca Community Space	Proposed Tula Pavilion
Uses	<ul style="list-style-type: none"> • Lobby • Meeting rooms • Restrooms • Kitchen • Storage • Custodial • “Star Center” • Offices • TV lounge • Recreation • Laundry • Faculty apartments 	<ul style="list-style-type: none"> • Lobby • Restrooms • Storage • “Star Center” • Offices • TV lounge • Recreation • Laundry • Faculty apartments • “Backyard” outdoor room 	<ul style="list-style-type: none"> • Assembly/banquet space divisible into three meeting rooms • Small conference room • Storage • Custodial • Offices • Mechanical • Restrooms • Catering Kitchen • Courtyard • Arcade

*Note: Approximately 6,000 square feet of exterior elements also would be provided.

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 several classes of exemption, including Classes 2 and 32.

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

Under CEQA Guidelines section 15302, Replacement or Reconstruction (14 CCR § 15302), projects that involve construction of new structures located on the same site as the structure replaced and have substantially the same purpose and capacity as the structure replaced, and that meet the following exemplary conditions are characterized as replacement or reconstruction of existing structures and facilities, and, therefore, are categorically exempt from CEQA under Class 2:

- (a) Replacement of a commercial structure with a new structure of substantially the same size, purpose, and capacity.
- (b) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.

The proposed project meets each of the conditions set forth in the CEQA Guidelines section 15302 and, therefore, is exempt from CEQA:

- (a) The proposed project involves removal of the Tula/Tenochca Community Center and replacement with the Tenochca Community Space and Tula Pavilion. The replacement structures are of substantially the same size, purpose, and capacity as the existing structure. As noted above in Table 1, the demolished Tula/Tenochca Community

Center is approximately 20,000 gross square feet (gsf) and would be replaced with substantially the same sized structures; the proposed Tenochca Community Space and Tula Pavilion together total 25,000 gsf. The proposed Tenochca Community Space and Tula Pavilion would serve substantially the same purpose as the Tula/Tenochca Community Center, providing public conference spaces and student service spaces. The proposed Tenochca Community Space and Tula Pavilion would be substantially the same capacity as the removed structure with a height of 1-2 stories.

- (b) Replacement of the Tula/Tenochca Community Center as part of the proposed project involves negligible or no expansion of capacity of existing utility systems and/or facilities.

Class 32 (CEQA Guidelines § 15323, In-Fill Development)

Under CEQA Guidelines section 15323, 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 replacement of an existing building and paved area with separate structures to house student services and public gathering spaces and following minor master plan amendments made as part of the project would be consistent with the SDSU Campus Master Plan (the applicable general plan) and similar to the surrounding campus buildings.
- (b) The proposed project would be located within the city of San Diego limits on a project site of no more than 5 acres in size that is substantially surrounded by urban uses.
- (c) The proposed project site consists of an existing building and a paved walking path and has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the proposed project would not result in any significant effects to traffic, noise, air quality, or water quality.
- (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. Specifically, Linscott Law & Greenspan (LLG), Traffic Engineers, determined that potential impacts would arise principally during the construction of the proposed project, and any such impacts would be temporary and **less than significant**. This determination is based on the following analysis as contained in the technical memorandum prepared by LLG entitled *San Diego State University Tula/Tenochca Project Transportation Impact Analysis* (December 19, 2016). This technical memorandum is included in its entirety as Appendix F and is incorporated herein by this reference.

Construction Impacts

The traffic engineer, LLG, determined peak construction activity levels using several factors, including utilization of heavy vehicles, duration of demolition, and intensity of construction traffic (for trucks and employees). Based on these factors, at peak construction activity levels, the proposed project would be expected to generate 34 truck, 40 worker, and 4 vendor trips per day.

Specifically, LLG calculated the number of truck trips generated by the proposed project based on the total amount of debris (e.g., asphalt) to be removed from the site during demolition. The amount of debris is calculated to be approximately 3,361 cy, and would be hauled away over an approximate 1 month period (i.e., approximately 20 work days). Based on a capacity of approximately 10 cy of debris per truck, a total of approximately 337 truckloads would be required to haul the asphalt waste from the site. This averages out to approximately 17 truckloads per day (i.e., 337 truckloads/20 work days). The number of average daily trips (ADT) produced by the daily truckloads was tripled using a passenger car equivalent (PCE) adjustment factor of 3.0 to account for the additional impacts trucks impose on the roadway system as compared to passenger cars.

Therefore, it is calculated that the trucks would generate 102 ADT [17 truckloads x 2 x 3.0 PCE].

In addition, a total of 20 employees and 2 miscellaneous/vendors are expected to access the project site on a typical day. For the purpose of the traffic analysis, employees and vendor trips were combined together, for a total trip generation of 44 ADT [22 employees/vendors x 2 trips].

Therefore, adding together PCE-adjusted truck trips per day and the expected amount of employee/vendor trips, at maximum construction activity levels, the proposed project is expected to generate 146 temporary construction-related ADT, with 33 trips during the AM peak hour and 33 trips during the PM peak hour for a period lasting approximately 1 month.

LLG determined the analysis study area based on the traffic routes expected to be utilized by construction-related vehicles. (See Appendix F, Figure 1.) Heavy vehicles hauling debris from the site principally would utilize Montezuma Road to Fairmount Avenue to access Interstate 8 (I-8). This route is generally a less-congested route than College Avenue to I-8 and also better accommodates truck traffic. It is expected that the non-truck trips (workers and vendors) would utilize Montezuma Road and College Avenue to and from the I-8 corridor because it is the most direct route to the proposed project site. LLG's traffic analysis noted that the project-related trips would add a nominal amount of temporary vehicle trips to I-8. These trips would be less than the day-to-day fluctuation of traffic on I-8 and therefore would not adversely affect operations on that route.

LLG found that of the three project study area intersections (Montezuma Rd/Collwood Blvd, Montezuma Rd/55th St, and Montezuma Rd/College Ave), all three intersections would operate at acceptable Level of Service (LOS) D or better operations under Existing plus Project scenario. Also, LLG found that at the three study area street segments (Montezuma Rd: Fairmount Ave to Collwood Blvd, Collwood Blvd to 55th St, and 55th St to College Ave), two segments were calculated to operate at acceptable LOS C. The remaining segment, Montezuma Road: Fairmount Avenue to Collwood Boulevard, would continue to operate at its present LOS F with the addition of the proposed project's temporary construction traffic. However, the proposed project's vehicle capacity (V/C) contribution on this street segment would not exceed the allowable 0.01 increase.

Based on the above discussion, construction-related traffic impacts would be **less than significant**.

Operational Impacts

With respect to operation-related impacts, as the proposed project would be used primarily by staff, students, and others typically already on campus for classes or other events, the proposed project would not generate any additional vehicle trips and therefore, would not result in a measurable increase in operational traffic. As a result, operation-related impacts would be less than significant.

- (ii) Noise: The proposed project would not result in either significant construction- or operation- related noise impacts. This conclusion, and the analysis that follows, is

based on the technical memorandum prepared by Dudek entitled *SDSU Tula Pavilion and Tenochca Hall Renewal/Refresh Noise Technical Memorandum* (January 3, 2017). This technical memorandum is included in its entirety as Appendix E and is incorporated herein by this reference.

Construction-Related Noise

The highest noise levels are predicted to occur during temporary demolition and grading activities when noise levels from construction would be as high as 70 dBA equivalent continuous sound level ($L_{eq, 12-hr}$) at the nearest existing residences, approximately 110 feet away from the proposed project site (see Appendix E, Table 3, Summary of Results – Estimated Construction Noise). At more typical distances, construction noise would range from approximately 56 to 67 dBA L_{eq} . As a result, at the nearest off-site, noise-sensitive land uses, the noise levels during temporary construction-related activities would be below the City's 75-dBA (A-weighted decibel (adjusted for the frequency response of the human ear)), 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 **less than significant**.

Temporary increases in traffic noise related to heavy truck, worker, and vendor vehicles would be less than 1 decibel (dB) along the construction routes at all of the modeled roadway segments (see Appendix E, Table 4, Construction-Related Traffic Volumes and Estimated Traffic Noise Increases). A change in noise levels of less than 1 dB in the context of the community environment is not considered to be a perceptible change. Although individual truck pass-bys would be audible, the temporary increase in the number of trucks and passenger vehicles would not contribute significantly to the average hourly or daily noise environment. Therefore, noise impacts associated with construction-related traffic would be **less than significant**.

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

Operation-Related Noise

Because the new buildings would merely replace an existing building and its associated uses, the proposed project would not generate new or additional students, staff, or visitors to the SDSU campus. No new operational noise impacts to off-site noise-sensitive land uses would result and, therefore, impacts would be **less than significant**.

Construction-Related Vibrations

The heavier pieces of construction equipment used at the project site could include bulldozers, graders, loaded trucks, water trucks, pavers, and cranes. No blasting or pile driving would take place as part of project construction. Ground-

borne vibration and noise information related to construction activities collected by the California Department of Transportation (Caltrans 2004) indicates that continuous vibrations with a peak particle velocity of approximately 0.1 inches/second begin to annoy people. Ground-borne vibration from the heavy equipment that would be used in connection with construction of this proposed project is typically attenuated over short distances (i.e., within 25 to 50 feet). At the nearest off-site land uses, located approximately 110 or more feet away, groundborne vibration levels from project construction would be approximately 0.01 inches/second and thus well below the threshold of annoyance. Construction-related activities are not anticipated to expose persons to or generate excessive ground-borne vibration or noise levels. Therefore, potential impacts under this threshold would be **less than significant**.

- (iii) *Air Quality:* The proposed project would not result in either significant construction- or operation- related air quality impacts. The following analysis is based on the technical memorandum prepared by Dudek entitled *SDSU Tula Pavilion and Tenochca Hall Renewal/Refresh Air Quality and Greenhouse Gases Emissions Technical Memorandum* (January 4, 2016). This technical memorandum is included in its entirety as Appendix A 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 significant impacts. Dudek determined that construction and operation of the proposed project would not result in regional growth that is not accounted for in the SIP and RAQS (SDAPCD 2009) because the proposed project as implemented would not generate additional student growth at the SDSU campus; rather, it would provide updated amenities and services to the existing student population. Specifically, the proposed project would not generate new operational vehicle trips that are otherwise unaccounted for in the California Air Resources Board's (CARB's) mobile source emission projections and would not generate new population growth that is otherwise unaccounted for in SANDAG's growth projections; as such, the proposed project would not conflict with the projected emission trends provided in the RAQS and the SIP. Therefore, the proposed project would be consistent at a regional level with the underlying growth forecasts in the RAQS and the SIP, and impacts would be **less than significant**.

Construction Impacts

Construction of the proposed project would result in a temporary addition of pollutants to the local airshed caused by fugitive dust emissions, combustion pollutants from on-site construction equipment, and off-site trucks hauling demolition debris and construction materials. Daily construction emissions resulting from the proposed project were estimated and determined not to exceed the SDAPCD significance thresholds for criteria pollutants (see Appendix A, Table 3, Estimated Maximum Daily Construction Criteria Air Pollutant

Emissions); therefore, impacts during construction would be **less than significant**.

Operational Impacts

Following the completion of construction activities, operation of the proposed project would generate criteria pollutant emissions from area, energy, and mobile sources. Operational emissions were found to be below the SDAPCD's significance thresholds (see Appendix A, Table 4, Estimated Maximum Daily Operational Criteria Air Pollutant Emissions) and would lead to at most nominal emissions (i.e., increases that amount to less than one additional pound per day of each pollutant). Therefore, operational emissions would be **less than significant**.

Toxic Air Contaminants (TAC)

The greatest potential for TAC emissions during construction would be diesel particulate emissions from heavy equipment operations and heavy-duty trucks and the associated health impacts to sensitive receptors. The closest sensitive receptors to the proposed project would be residents of apartments located along Hardy Avenue, approximately 500 feet southwest of the proposed project site. The proposed project would not require the extensive use of heavy-duty construction equipment and would not involve extensive use of diesel trucks, which are also subject to a CARB Airborne Toxics Control Measure. Total active construction of the proposed project would take approximately 330 days, after which project-related diesel exhaust emissions would cease. The proposed project would not generate TACs as part of project operations.

Thus, the proposed project would not result in a long-term source of TAC emissions. No residual diesel exhaust TAC emissions and corresponding cancer risk are anticipated after construction, and no long-term sources of TAC emissions are anticipated during operation of the proposed project. As such, the exposure of project-related TAC emission impacts to sensitive receptors would be **less than significant**.

Carbon Monoxide Hotspots

Construction Impacts

Due to the temporary operation of construction equipment in any one area, construction would not emit CO in quantities that could pose health concerns. The proposed project would generate negligible CO emissions (i.e., 11.55 pounds per day compared to the threshold amount of 550 pounds per day) (see Appendix A, Table 4, Estimated Maximum Daily Operational Criteria Air Pollutant Emissions). Sensitive receptors' exposure to CO would be **less than significant**.

Operational Impacts

The proposed project would not generate operational traffic trips, which is the main source of CO emissions. As a result, exposure of sensitive receptors to CO would be **less than significant**.

Objectionable Odors

Odors would be generated from vehicles and/or equipment exhaust emissions during proposed project construction. Such odors are temporary and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be **less than significant**.

Land uses and industrial operations typically associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Because the proposed project involves university community and assembly spaces, it would not create land uses commonly associated with substantial odors. Therefore, project operations would result in an odor impact that is **less than significant**.

- (iv) *Greenhouse Gas Emissions:* The proposed project would not result in either significant construction- or operation- related greenhouse (GHG) impacts. The following analysis is based on the technical memorandum prepared by Dudek entitled *SDSU Tula Pavilion and Tenochca Hall Renewal/Refresh Air Quality and Greenhouse Gases Emissions Technical Memorandum* (January 4, 2016). This technical memorandum is included in its entirety as Appendix A and is incorporated herein by this reference.

The proposed project's GHG emissions were estimated based on construction equipment use and vehicle trips associated with construction activities, as well as operational emissions once construction is complete. The estimated GHG emissions generated during project construction and operations would be approximately 130 MT CO₂E (metric tons of carbon dioxide equivalent) (see Appendix A, Table 6, Annual Operational GHG Emissions). Although CSU/SDSU has not established official thresholds for GHG emissions, the City of San Diego issued guidance that includes a screening threshold of 900 MT CO₂E per year, which is used here for the limited purpose of analyzing GHG emissions from the proposed project (City of San Diego 2010). Because the proposed project would result in a net increase of 130 MT CO₂E per year, which is below the screening threshold within the City of San Diego, impacts would be **less than significant**.

Because the proposed project would not exceed the identified screening threshold, and because the proposed project would adhere to all applicable regulatory compliance measures, the proposed project would not conflict with GHG reduction goals for California established by Executive Order S-3-05, Assembly Bill (AB) 32 and Senate Bill (SB) 32. Further, although CSU/SDSU has not established an official climate action plan (CAP), CSU/SDSU has implemented sustainability strategies and programs to reduce energy consumption, water consumption, and solid waste generation, all of which reduce GHG emissions associated with university activities in accordance with state policy and consistent with the City of San Diego's CAP. Therefore, impacts would be **less than significant**.

- (iv) Water Quality: The proposed project would not result in either significant construction- or operation- related water quality impacts. The proposed project would be constructed on previously developed sites in an urban area on the SDSU campus. Development of the proposed project would result in a slight increase in impermeable surfaces, potentially resulting in increased surface water runoff from the project site. However, the increased runoff would be limited, and existing facilities would adequately collect the runoff and would have sufficient capacity to accommodate the increased runoff. Additionally, the proposed project would comply with all applicable water quality requirements during both the construction and operational phases. Therefore, impacts, if any, to water quality would be less than significant.
- (e) The site of the proposed project can be adequately served by all required utilities and public services. Because the proposed project would not generate new or additional students, faculty, or staff, the proposed project would not increase the demand for campus or public services.

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

Under CEQA Guidelines section 15061(b)(3), Review for Exemption (14 CCR § 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 technical reports prepared for the Proposed Project, attached hereto as appendices and summarized below, demonstrate that there is no possibility that construction or operation of the Proposed Project would result in a significant effect on the environment.

Air Quality and Greenhouse Gas (GHG) Emissions: See discussion under Class 32 for information regarding potential Air Quality and GHG impacts.

Energy: The proposed project would not result in either significant construction- or operation- related energy impacts. The following analysis is based on the technical memorandum prepared by Dudek entitled *SDSU Tula Pavilion and Tenochca Hall Renewal/Refresh Energy Consumption Technical Memorandum* (January 5, 2016). This technical memorandum is included in its entirety as Appendix B and is incorporated herein by this reference.

Electricity

Construction Use

San Diego Gas & Electric (SDG&E) would provide temporary electric power for lighting and electronic equipment inside temporary construction trailers. The electricity used for such activities would be temporary and relatively negligible. Similarly, electricity use during construction would have a negligible contribution to the proposed project's overall energy consumption.

Operational Use

The operational phase would require electricity for, among others, building heating and cooling, lighting, appliances, and electronics. Additionally, the supply, conveyance,

treatment, and distribution of water would indirectly result in electricity usage. Upon project implementation, the amount of electricity used per square foot is anticipated to decrease. The existing on-site uses have an annual electricity demand of approximately 10.77 kWh per square foot, whereas the proposed project's annual electricity demand would be approximately 9.11 kWh per square foot. Measured against existing conditions, the proposed project would result in an approximate 15% net decrease in annual electricity demand per square foot. This anticipated decrease is attributable to the newer, energy-efficient building design and the increasing stringency of modern energy standards.

Specifically, the proposed project would be subject to the more stringent 2016 Title 24 standards, effective January 1, 2017. Additionally, the proposed project would include energy-saving design features, including installation of Energy Star-labeled products and appliances where appropriate, compact fluorescent light bulbs, energy saving lighting schemes such as occupancy-sensing controls (where applicable), use of light emitting diode (LED) lighting or other energy-efficient lighting technologies where appropriate, and energy-efficient heating and cooling equipment. The project would comply with the California Building Energy Efficiency Standards (24 CCR, Part 6). And, the proposed project would be designed to meet a minimum of LEED Silver certification or equivalent, which requires meeting minimum energy performance standards, energy commissioning requirements, energy metering, and refrigerant management.

For the reasons set forth above, the proposed project's electricity consumption would not be inefficient or wasteful, and impacts would be **less than significant**.

Upon implementation, the proposed project's electricity consumption would increase by 226,101 kWh per year. This increase represents 0.0004% (226,101 kWh / 13 billion kWh) of SDG&E's existing demand within San Diego.

Between 2012 and 2050, the County's electricity demand is anticipated to grow by approximately 52.6%. The increase in electricity consumption attributable to the proposed project is approximately 0.00001% of the County's 2012 electricity demand and 0.000008% of the County's anticipated 2050 demand. (In 2012, the County's annual electricity consumption was 19,737 GWh and in 2050, the County's annual electricity consumption is anticipated to be 30,116 GWh per year (SANDAG 2015).) The increase in electricity usage attributable to the proposed project would be negligible and would fall well within the total growth in demand anticipated in the General Plan. As a result, impacts would be **less than significant**.

Natural Gas

Construction Use

Natural gas is not anticipated to be required during construction. Any minor amounts of natural gas that may be consumed during project construction would be temporary and negligible and, therefore, would have a negligible contribution to the project's overall energy consumption.

Operational Use

Proposed project operations would require natural gas for various purposes, including building heating and cooling and service water heating (ACEEE 2010). Upon project

implementation, the amount of natural gas used per square foot would decrease. The existing on-site uses have an annual natural gas demand of 41.25 kBTU per square foot, whereas the proposed project's annual natural gas demand would be approximately 36.49 kBTU per square foot. Therefore, as measured against the existing environmental condition, the proposed project would result conservatively in a 12% net decrease in annual natural gas usage per square foot. This anticipated decrease is attributable to the newer, energy-efficient building design and the increasing stringency of modern energy standards.

As with electricity demand, the anticipated reduction in natural gas usage per square foot is attributable, in part, to compliance with the more stringent 2016 Title 24 standards. Project design, including energy-efficient heating and cooling equipment, also could exceed energy efficiency code requirements. The proposed project would be designed to meet a minimum of LEED Silver certification or equivalent.

For the reasons stated above, the proposed project's natural gas consumption would not be inefficient or wasteful, and impacts would be **less than significant**.

Petroleum

Construction Use

Proposed project construction activities, including use of heavy duty construction equipment, haul trucks, and other construction-related vehicles, would rely on diesel fuel. Heavy-duty construction equipment would consume approximately 1,837 gallons of diesel fuel during the proposed project's construction period. Based on LLG's traffic analysis (see Appendix F), approximately 337 one-way haul trips would be required over the course of the construction period. Based on a vehicle miles traveled (VMT) of 6,740 VMT ($337 * 20$ miles) at 5.4 miles per gallon for heavy duty trucks, hauling would consume 1,248 gallons of petroleum.

Other construction-related vehicles would travel to and from the site to deliver materials. Approximately 500 one-way vendor truck trips would occur over the course of the construction period, resulting in 3,650 VMT ($500 * 7.3$ miles). At 21.7 miles per gallon, construction activities on site would use approximately 168 gallons of petroleum for vendor trips.

Construction workers traveling to and from the project site throughout the construction period also would consume fuel. The number of construction workers required would vary based on the construction phase and activity, and would result in 16,524 VMT ($1,530 * 10.8$ miles). At 21.7 miles per gallon for light duty vehicles, construction activities on site would use approximately 762 gallons of petroleum for construction worker trips.

Conservatively, the proposed project would consume 4,015 gallons of petroleum during the construction phase ($1,837 + 1,248 + 168 + 762$). By comparison, California's consumption of petroleum is approximately 72 million gallons per day, and approximately 32 billion gallons over the course of the 15 month construction period (72 million gallons per day * 15 months * 30 days per month) (EIA 2016b). Proposed project construction would equate to 0.00005% of the total amount of petroleum used statewide during the course of the construction period. Petroleum consumption during construction

would be temporary and would be typical of construction projects of similar types and sizes and would not necessitate new petroleum resources beyond what are typically consumed in California. As a result, impacts during construction would be **less than significant**.

Operational Use

As noted above, because operation of the proposed project would not generate new vehicle trips, there would be no increased petroleum-related impacts upon operational use.

As discussed above, the proposed project would comply with existing energy standards and regulations and would be designed to meet LEED Silver certification or equivalent. As part of this compliance, the proposed project would have (a) at least 50% of its construction and demolition waste diverted from landfills; (b) mandatory inspections of energy systems to ensure optimal working efficiency; (c) low-pollutant emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring and particle boards; and, (d) a 20% reduction in indoor water use. Thus, **no impact** would result.

Hazards: The proposed project would not result in either significant construction- or operation- related hazardous materials impacts. The following analysis is based on the technical memorandum prepared by Dudek entitled *SDSU Tula Pavilion and Tenochca Hall Renewal/Refresh Hazards Technical Memorandum* (January 4, 2016). This technical memorandum is included in its entirety as Appendix C and is incorporated herein by this reference.

Construction Impacts

During proposed project construction, hazardous materials, including fuel, motor oils, cleaning solvents, and paints, would be stored, used, and generated on the proposed project site. A potentially significant impact related to the unintended release of hazardous materials during routine transport, use, or disposal might occur. However, as the proposed project would be subject to and required to comply with all hazardous materials laws and regulations, and any potential impacts would be **less than significant**.

Due to the Tula/Tenochca Community Center's age, asbestos containing materials may be encountered, and any release to the environment could result in a significant impact. As such, prior to demolition and during project design, an asbestos survey will be completed before the commencement of construction activities to ensure that any asbestos containing material is appropriately identified. Any remediation plan would be developed and carried out in compliance with all San Diego County Department of Environmental Health and Environmental Protection Agency (EPA) standards, reducing any potential impacts to **less than significant**.

Operational Impacts

The proposed project would involve the replacement of student community space and the assembly space and classrooms. These uses would not result in the routine transport, use, or disposal of hazardous materials outside of standard janitorial supplies which are handled, stored, disposed of, and generally managed pursuant to SDSU's Environmental Health and Safety standards and protocols. Therefore, once operational, **no significant impact** would occur.

A review of regulatory records and historical aerial photographs and topographic maps did not show any evidence of a hazardous substance or material release on the project site. Therefore, it is not expected that workers would encounter impacted soils during grading and construction activities at the project site. Nonetheless, adherence to all hazardous materials laws and regulations would prevent a hazardous material situation from affecting the project site, and any potential impact would be **less than significant**.

The proposed land uses would not introduce new hazardous emissions or hazardous material sources to the SDSU campus. Nonetheless, SDSU will adhere to all hazardous materials laws and regulations that would ensure all hazardous materials and substances are handled, stored, transported, and disposed of in accordance with SDSU Department of Environmental Health and Safety protocols. Therefore, the proposed project would result in **no impacts** related to hazardous emissions or hazardous waste release.

The proposed project site is not located on regulatory databases searched by Environmental Data Resources (EDR). A review of the EDR report, historical topographic maps and aerial photographs, and GeoTracker and EnviroStor databases offered no support for finding that construction activities would result in a potential hazardous material or substance release. Consistent with regulatory requirements, an asbestos, lead-based paint, and termiticides evaluation will be performed in conjunction with project construction to determine the presence of any of these substances. Should these substances be discovered, a remediation plan, consistent with the San Diego County Department of Environmental Health and the EPA, would be developed and implemented to ensure that all substances are safely handled and disposed. Therefore, the project would result in a **less than significant impact**.

Historical Resources: The proposed project would not result in either significant construction- or operation- related historical resources impacts. The following analysis is based on the technical memorandum prepared by Dudek entitled *SDSU Tula Pavilion and Tenochca Hall Renewal/Refresh Historical Resources Technical Memorandum* (January 3, 2016). This technical memorandum is included in its entirety as Appendix D and is incorporated herein by this reference.

Historic Resources

The survey conducted as part of the technical analysis did not identify any historic-age buildings within the proposed project area. Within the proposed project's footprint, only the Tula/Tenochca Community Center would be removed. The Tenochca Residence Hall would remain, untouched.

The Tula/Tenochca Community Center was designed by Salerno/Livingston & Partners and was built during 1986 as an addition to the existing multipurpose room in Tenochca Residence Hall. The addition expanded the building westward, adding a separate entrance, two bathrooms, two meeting rooms, and a storage room. Consistent with the Tenochca Residence Hall, the Tula/Tenochca Community Center is a utilitarian example of a transitional Postmodern style, combining aspects of Postmodern and International styles. Simple, clean modern aesthetics are dominated by smooth, unadorned surfaces; linear groupings of windows interspersed with large windowless walls; a unified light-colored stucco wall cladding; and asymmetrical massing.

Evaluation of the Tula/Tenochca Community Center considered national, state, and local eligibility criteria, including eligibility for listing under the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). Archival research on the building failed to indicate any associations with important events or patterns of development. Additionally, archival research failed to uncover any association with persons important to our past. The Tula/Tenochca Community Center is a simple building that is not an exceptional example of any particular style of architecture and is not the notable work of a master architect. The building is unlikely to yield any information important to prehistory or history. As a result, the Tula/Tenochca Community Center would not be eligible for listing under NHRP or CRHR.

In addition, Dudek considered designation criteria located in the City of San Diego's Historical Resource Guidelines. Based on archival research, the building does not appear to exemplify or reflect special elements of the City's cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development. The building is not known to be associated with any significant persons or events. The Tula/Tenochca Community Center is a simple, unexceptional building and does not represent the notable work of a master architect. The building is not eligible for listing in the NRHP or CRHR. Finally, the building is not part of a historic district or group of resources. As a result, the Tula/Tenochca Community Center would not be eligible for designation under the City's criteria.

Because the building is not a historic resource, impacts would be **less than significant**.

Archaeological Resources

The California Historical Resources Information System records search and the Native American Heritage Commission (NAHC) Sacred Lands File search did not identify any cultural resources within the proposed project area. There are no surface indicators of archaeological resources, and the proposed project area has been developed for many years. Due to prior development activities at the proposed project area, it is reasonable to expect that any archaeological resources that may be present would have been discovered during prior construction activities.

The above notwithstanding, to comply with the requirements of CEQA Guidelines Section 15064.5 (14 CCR § 15064.5), as part of construction activities, subsequent to demolition and removal of existing structures and pavement from the project site, California State University/San Diego State University (CSU/SDSU), or its designee, will retain a qualified archaeologist (i.e., one listed on the Register of Professional Archaeologists) to complete an archaeological survey of ground surfaces within the project area. In the event the survey identifies potentially intact concentrations of prehistoric archaeological materials, focused data recovery archaeological excavations will be undertaken before commencement of construction in the area of concern. A qualified Native American representative will be retained to observe all focused data recovery excavations, if any. The focused excavations will characterize horizontal and vertical dimensions; chronological placement; site function; artifact/ecofact density and variability; presence/absence of subsurface features; research potential extent; and the integrity of the resources.

If the archaeological site is determined to be a historical resource within the meaning of California Environmental Quality Act (CEQA) Guidelines Section 15064.5(a), the archaeologist will comply with CEQA Guidelines Section 15126.4(b)(3)(A), which notes that preservation in place, where feasible, is the preferred approach, or, alternatively, CEQA Guidelines Section 15126.4(b)(3)(C), which requires preparation and adoption of a data recovery plan, as well as the submittal of all plans and studies to the California Historical Resources Regional Information Center. Alternatively, if the archaeological site qualifies as a unique archaeological resource (see CEQA Guidelines Section 15064.5(c)(3)), the archaeologist will treat the site in accordance with the provisions of Public Resources Code Section 21083.2.

All excavations and excavation and monitoring reports will be completed consistent with California Office of Historic Preservation's *Archaeological Resource Management Reports (ARMR): Recommended Contents and Format*. The archaeological excavation and monitoring reports will include all appropriate graphics, describing the results, analysis, and conclusions of the monitoring and excavation. All original maps, field notes, non-burial related artifacts, catalog information, and final reports will be curated at a qualified institution within San Diego County that complies with the State Historic Resource Commission's 1993 Guidelines for the curation of archaeological collections, as applicable.

With implementation of these procedures, potential impacts to archaeological resources would be **less than significant**.

Paleontological Resources

Published geological mapping (Kennedy 1975) and unpublished geotechnical investigations such as the geotechnical report prepared for the proposed project (Southland Geotechnical Consultants 2015) demonstrate that the site is underlain by the Stadium Conglomerate and the Mission Valley Formation, which have produced Eocene-age vertebrate fossils in the region. Therefore, these geological units should be considered to have a high potential to contain significant paleontological resources (City of San Diego 1996; County of San Diego 2007). However, as was the case with archaeological resources, it is reasonable to expect that any unique paleontological resource or unique geologic features that may be present would have been discovered during prior construction activities at the previously developed proposed project area.

Nonetheless, to comply with Public Resources Code Section 21083.2, before commencement of project construction, CSU/SDSU, or its designee, will retain a qualified paleontologist. The qualified paleontologist will coordinate with the grading and excavation contractors, acting in accordance with the Society of Vertebrate Paleontology's Guidelines, and monitor all on-site activities associated with the original cutting of previously undisturbed sediments of moderate to high resources sensitivity in order to inspect such cuts for contained fossils.

In the event that the monitoring results in the discovery of potentially unique paleontological resources within the meaning of Public Resources Code Section 21083.2, the qualified paleontologist will have the authority to halt excavation at that location and immediately evaluate the discovery. Following evaluation, if the resource is determined to be "unique" within the meaning of Public Resources Code Section 21083.2, the site

will be treated in accordance with the provisions of that section. Protocols appropriate to the discovered resource, including recovery, specimen preparation, data analysis, and reporting, will be carried out in accordance with the Society of Vertebrate Paleontology guidelines before resuming grading activities at that location. Grading activities may continue on other parts of the building site while appropriate protocol is implemented.

Recovered fossils, along with copies of pertinent field notes, photographs, and maps, will be deposited in an accredited paleontological collections repository. A final summary report that discusses the methods used, stratigraphy exposed, fossils collected, and significance of recovered fossils also will be prepared in a manner that is consistent with the Society of Vertebrate Paleontology guidelines.

With implementation of these procedures, potential impacts to unique paleontological resources or unique geologic features would be **less than significant**.

Human Remains

There is no indication that human remains are present within the boundaries of the proposed project site. The proposed project site is located in a heavily developed area and due to prior development activities at the site, it is reasonable to expect that any human remains that may be present would have been discovered during prior construction activities. Notwithstanding this expectation, previously unidentified human remains still may be uncovered during ground-disturbing activities such as foundation excavation. So, to comply with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e)(1) (14 CCR § 15064.5(e)(1)), if, during any phase of proposed project construction, there is the discovery or recognition of any human remains in any location other than a dedicated cemetery, the steps outlined below will be taken.

There will be no further excavation or disturbance of the site or any nearby area reasonably susceptible to overlying adjacent human remains until the San Diego County Coroner is contacted to determine that no investigation of the cause of death is required. However, if the Coroner determines the remains to be Native American, the Coroner will contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC will identify the person or persons it believes to be the most likely descendant from the deceased Native American, and the most likely descendant may make recommendations to CSD/SDSU for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

However, if any of the following occurs – the NAHC is unable to identify a most likely descendant; the most likely descendant failed to make a recommendation within 24 hours after being notified by the NAHC; the identified descendant fails to make any recommendation; or, CSU/SDSU, or its designee, rejects the recommendation of the descendant and mediation by the NAHC fails to provide measures acceptable to CSU/SDSU – then, CSU/SDSU, or its designee, will rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance, pursuant to CEQA Guidelines Section 15064.5(e)(2) (14 CCR 15064.5(e)(2)).

With implementation of these procedures, potential impacts to discovered human remains would be **less than significant**.

Noise: See discussion under Class 32 for information regarding potential noise impacts.

Traffic: See discussion under Class 32 for information regarding potential traffic impacts.

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

Under CEQA Guidelines section 15300.2(c), Exceptions (14 CCR § 15300.2), 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." Based on the information contained herein and in the attached technical memoranda, and given the nature and location of the proposed project, there are no unusual circumstances surrounding the proposed project that would suggest a reasonable possibility of a significant effect. Therefore, the proposed project would be exempt under the above-cited classifications.

Appendices

- Appendix A Dudek – SDSU Tula Pavilion and Tenochca Hall Renewal/Refresh - Air Quality and Greenhouse Gases Emissions Technical Memorandum, January 4, 2017
- Appendix B Dudek – SDSU Tula Pavilion and Tenochca Hall Renewal/Refresh - Energy Consumption Technical Memorandum, January 5, 2017
- Appendix C Dudek – SDSU Tula Pavilion and Tenochca Hall Renewal/Refresh - Hazards Technical Memorandum, January 4, 2017
- Appendix D Dudek – SDSU Tula Pavilion and Tenochca Hall Renewal/Refresh - Historical Resources Technical Memorandum, January 3, 2017
- Appendix E Dudek – SDSU Tula Pavilion and Tenochca Hall Renewal/Refresh Noise Technical Memorandum, January 3, 2017
- Appendix F Linscott Law & Greenspan (LLG), Traffic Engineers – San Diego State University Tula/Tenochca Project Transportation Impact Analysis, December 19, 2016